

ROSSENDALE DRAFT LOCAL PLAN
Pre-Submission Publication Version
Regulation 19 Consultation
COMMENTS RECEIVED



December 2018

Rossendale
BOROUGH COUNCIL

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Responses received during the Local Plan (Regulation 19) Consultation

23rd August - 5th October 2018

Policy SD1

Presumption in Favour of Sustainable Development

DRAFT LOCAL PLAN POLICIES

Chapter 0: Spatial Strategy

Comments on policy SD1 Presumption in Favour of Sustainable Development

Reference **18 Mr Kenneth Howieson** - Number of supporters:

Commenting on Land opposite 1019 Burnley Road

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

POLICY SD1 PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

3.1 This policy is in line with the Framework and supports sustainable development in accordance with the Local Plan, unless material considerations indicate otherwise. In addition, where policies are out of date or irrelevant the Council will grant permission unless material considerations indicate otherwise, taking into account any adverse impacts that would demonstrably outweigh the benefits or any specific policies in the Framework that indicate development should be restricted.

3.2 This policy is supported as it is directly in line with the Framework.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5018 Brian Michael Kathy Fishwick** **Rosendale Civic Trust** Number of supporters:

Commenting on SD1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT supports SD1 subject to amendment to definitions of sustainable development in 2011 Core Strategy and NPPF 2012, and prefers these: Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly. Not just a lot of low density "aspirational" housing". Nor now demolished free grant money projects such as Blackburn's Waves Leisure Pool that followed the 1981 riots.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

-

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

SD1: Presumption in favour of sustainable development

9.1 Peel welcomes the inclusion of Policy SD1 in the Pre-submission Local Plan, which outlines the Council's overall approach to the determination of planning applications in accordance with NPPF.

9.2 However, as presented the detailed wording of Policy SD1 is not consistent with the presumption in favour of sustainable development set out at paragraph 11 of the NPPF.

The third paragraph of the policy should be amended as follows:

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless:

- a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against policies in the NPPF taken as a whole; or
- b) specific policies in the NPPF relating to the protection of areas or assets of particular importance indicate that development should be restricted.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section 3

Comments on policy SD2**Urban Boundary and Green Belt**

Reference **18 Mr Kenneth Howieson** - Number of supporters:

Commenting on Land opposite 1019 Burnley Road

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. INTRODUCTION 1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. The Council are asking for comments on the Draft Local Plan which will replace the Core Strategy once it is adopted. 1.2 The Draft Local Plan document has been informed by a series of evidence base documents, and previous consultations undertaken on proposed changes to the Urban Boundary and the Green Belt1. 1.3 The evidence base comprises the following documents: • Strategic Housing Land Availability Assessment (SHLAA) - Stages 1 & 2 and Site Assessments 2017 • Strategic Housing Market Assessment (SHMA) 2017 • Employment Land Review 2017 • Green Belt Review 2016 • Environmental Network Study 2017 • Gypsies and Travellers Accommodation Assessment 2016 • Town Centre, Retail, Leisure and Tourism Study 2017 • Playing Pitch Strategy 2016 (previously published) • Strategic Flood Risk Assessment (SFRA) 2016 • Local Plan Viability Study 2015 and Updated Viability Study in relation to Affordable Housing 2017 • Landscape Study 2015 (previously published) • Landscape capacity study for wind energy developments in the South Pennines (2014) (previously published).

1.4 Rossendale's Local Plan will designate land and buildings for future uses to meet the Borough's needs and set out what developments should look like and how they should fit in with their surroundings.

1.5 Sites have been proposed for development (such as housing or employment sites), for environmental protection and for recreation uses on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation areas and an extension to an existing Conservation area are being considered.

BACKGROUND

1.6 Hourigan Connolly is instructed to review and comment on the Draft Local Plan in relation to land opposite 1019 Burnley Road in Loveclough, Rossendale. Currently the site is designated as being located beyond the Urban Boundary within the open countryside. On behalf of our client, we seek to promote a change to the Urban Boundary to include the subject site.

1.7 This Statement will demonstrate that a change to the Urban Boundary to include the subject site would accord with the criteria set out by the Council as part of their consultation for the Review of existing Green Belt and Urban Boundary in 2012 / 2013 (no update to this appears to be available as part of the 2017 consultation).

1.8 The location of the site is shown below, at Figure 1.1.

Figure 1.1 Site Location & Context (NB. Red line is for indicative purposes only).

1.9 The site itself has been previously developed and includes nine existing garages, which are currently used for storage purposes, with two being used as workshops for local builders. These are accessed via an existing track which is in private ownership but is a public right of way. Abutting the site to the east is an allotment and further garage which is under separate ownership. The to the south is greenfield land, beyond which is existing residential development.

Figure 1.2 Existing garages within the site, viewed from Burnley Road

1.10 The site is bordered to the north by recreational sports fields (Loveclough Sports Field), to the east by Burnley Road with residential uses beyond and to the south by further existing residential uses.

1.11 Land to the north west of the site benefits from a recent planning permission for a large allotment development², which was approved by the Council's Planning Committee on 10 December 2013 and is under construction. This development is known as Badgercote Allotments and is on land owned by the Council. Also to the west is the settlement of Goodshaw Fold.

1.12 The site is within walking distance of a number of settlements including Goodshaw, Crawshawbooth and Dunnockshaw, which provide a variety of services, and the topography of the area is conducive to walking, with good, well-surfaced and street-lit footways on both sides of all the roads in the area. There are a number of facilities within a 5km cycling distance of the site, including primary, secondary and further education facilities, convenience and large-format foodstores, accessible via traffic-free routes.

1.13 The site has previously been subject to an appeal against the Council's decision to refuse full planning permission on 05 February 2015 for the erection of 15no. detached dwellings including formation of access from Burnley Road and landscaping³. The appeal was dismissed by the Planning Inspectorate, primarily on the grounds of landscape impact on 4th February 2016.

1.14 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

OVERVIEW

1.15 The starting point for consideration of the Draft Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

1.16 On behalf of Mr Ken Howieson we strongly recommend that the Council redraw the Urban Boundary so that it includes the area of land subject to this Representation.

1.17 Needless to say we will wish to participate in the Examination in Public and attend the relevant hearings and will make further representations at the Regulation 19 Submission stage.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Development Strategy.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The Rossendale Borough Council Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Councils such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and will guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The National Planning Policy Framework (hereafter referred to as the Framework) (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 Paragraphs 150 to 185 of the Framework deal with Plan-making.

2.11 The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the

principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development. These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.

- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.
- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159), business (Paragraphs 160 – 161), infrastructure (Paragraph 162) and environment (Paragraphs 165 – 168).

HOUSING

2.21 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability

Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.22 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- “meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand”.

BUSINESS

2.23 Paragraph 160 of the Framework outlines the importance of local planning authorities having a clear understanding (from a robust evidence base) of business needs within the economic markets operating in and across their area.

2.24 Paragraph 161 of the Framework establishes the importance of understanding business needs (both quantitative and qualitative) and ensuring that sufficient suitable land (both existing and future) is available to meet needs.

INFRASTRUCTURE

2.25 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.26 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.27 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE

2.28 The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.29 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Submission, in particular paragraph 030 (reference ID: 3-030-20140306 confirms): Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.30 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306): WHAT CONSTITUTES A 'DELIVERABLE SITE' IN THE CONTEXT OF HOUSING POLICY? Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years. However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe. The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.

2.31 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 (Reference ID 12-008-20140306) that: HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.32 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.33 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which have been submitted or will be submitted before 31 March 2018.

2.34 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.35 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

POLICY SD2 URBAN BOUNDARY AND GREEN BELT

3.3 This policy seeks to restrict new development to within the Urban Boundary, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.

3.4 The principle of this policy is supported; however, the proposed extent of the Urban Boundary is not. We consider that there is scope within the Borough to further revise the line of the Urban Boundary to accommodate the level of growth required to ensure the Borough's growth is sustainable and meets the aspirations of the Council moving forward.

4. PROPOSED AMENDMENT TO THE URBAN BOUNDARY

INTRODUCTION

4.1 Previous consultations by the Council on the Review of the Green Belt and Urban Boundary has resulted in a number of proposed changes to the Urban Boundary line as

shown on the draft Proposals Maps⁴. The Council used a number of criteria to assess whether a change to the Urban Boundary would accord with the purpose of the Urban Boundary to clearly define and differentiate between designated settlements, Countryside and Green Belt.

4.2 The subject site is situated within the Ward of Goodshaw in Loveclough. Loveclough is a village located between Burnley and Rawtenstall with quick and direct access by public transport to both towns via Burnley Road (A682). The bus shelters opposite the site are served by the X43 'Witch Way' bus service which provides an express service into Manchester City Centre.

4.3 Appendix 1 contains an extract from the Goodshaw Ward Proposals Map where the location of the subject site has been indicated with an arrow. Currently the site is located directly adjacent to the Urban Boundary. In the second extract, we have indicated how the Urban Boundary should be changed to include the site. The amendment to the delineation of the boundary line is minor.

4.4 By assessing the inclusion of the site within the Urban Boundary against the Council's criteria (as listed above), we reach the following conclusions:

Please see table in appendix

4.5 The subject site is sustainably located and any future development, would represent sustainable development, which the Framework establishes a presumption in favour of.

4.6 The Framework also encourages Local Planning Authorities to positively seek opportunities to meet the objectively assessed development needs of their area unless, inter alia, any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

4.7 With this in mind, we would recommend that the draft Proposals Map for Goodshaw Ward be revised to take account of a change to the Urban Boundary so that the site on land opposite 1019 Burnley Road, Loveclough is included within the Urban Boundary.

4.8 We reserve the right to add to make further submissions to the Council during the Local Plan preparation period.

5. CONCLUSIONS

5.1 The Council should amend the Urban Boundary to include the subject site within this boundary line to further deliver a sustainable level of growth and to properly reflect the lie of the land. To amend the Urban Boundary at this location would be sound and would not harm the objectives of the Local Plan and would accord with the Council's criteria set out in the Review of the Urban Boundary.

SUGGESTED MODIFICATION

3.5 The Council should change the Urban Boundary to include the subject site within this boundary line to further deliver a sustainable level of growth. To change the Urban Boundary at this location would be sound and would not harm the objectives of the Local Plan and would accord with the Council's criteria set out in the Review of the Urban Boundary.

3.6 The detailed proposed amendment to the Urban Boundary is shown in the following Chapter.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	31 Mr David Nuttall	Residents and Friends of Townsendfold	Number of supporters:
Commenting on	Green Belt Haslam Farm	Green Belt	
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	Yes
		Does the Local Plan complies with the duty to co-operate?	Yes

As a representative of Residents and Friends of Townsend Fold in defence of our Green Belt we believe the Forward Planning Department have been very diligent in the various reviews that have been carried out on this subject. In particular, the proposal to leave the land to the North and South of Duckworth Lane in the Green Belt following a detailed examination of Residents and other views has been exemplary and we consider the review procedure and communication sound.

Attachment:

Green Belt –Rossendale Local Plan (latest revision August 2018)

Comment from Friends and Residents of Townsend Fold in support of the proposal to leave Land at Haslam Farm (North and South of Duckworth Lane in the Green Belt)

Introduction

The land at Haslam Farm Townsend Fold (North and South of Duckworth Lane) has been designated as Green Belt and has served to protect the area from the unrestricted sprawl of large built up areas.

Rossendale Forward Planning has concluded that this area should remain in the Green Belt a decision which is wholeheartedly supported and endorsed by the residents of the area.

It should be noted that Theresa May in her speech of the 5th March 2018 stated clearly the government’s policy in relation to protecting the Green Belt when she said: “Tearing up Green Belt is not the answer to UK’s housing crisis and that existing protection will be maintained and in some cases strengthened”

There are many reasons for supporting the decision of the Forward Planning Department many of which have been submitted in detail during the investigative and consultative procedure. These papers are numerous and are in the possession of the responsible planning officials including a petition in support of the land remaining in the Green Belt signed by more than 1000 Residents and Friends of Townsend Fold.

The following is a snap shot of the reasons the residents of the area supported by the proposal in the current plan believe the area should remain firmly designated as being in the Green Belt.

1. Tourism

The East Lancashire Railway line (ELR) runs alongside this beautiful approach into Rossendale and during the investigatory process the management of ELR made it clear they fully supported the retention of the area in the Green Belt. The ELR dining train on Friday evenings (and others) makes a protracted halt in this area so that diners can enjoy an especially good view of the river and the surrounding countryside. During 2010 RBC’s own Tourism Study stated that the ELR was seen as the most significant individual attraction into Rossendale. A decision to change the Green Belt boundary will not help in the development and growth of tourism into Rossendale.

2. Gateway into Rossendale

The main approach into the Rossendale valley is via the A56 or the ELR both approaches currently travel through green countryside with wooded spaces which enhances the attractiveness of the area.

3. Preventing the unrestricted sprawl of large built up areas

The proposed Green Belt parcel which includes the area at Haslam Farm helps maintain a real sense of openness and carries out one of the principal reasons for the Green Belt i.e. the prevention of uncontrolled urban sprawl.

4. Preventing neighbouring towns merging

Our area of Green Belt forms part of a settlement gap which we understand is of critical importance and plays an essential role in preventing the erosion of the gap between

Rawtenstall and Edenfield.

5. Safeguarding the countryside from encroachment

This area of the Green Belt area is set within a river valley landscape which is rural in character and assists in protecting the countryside from potential encroachment of unwelcomed development from the East.

The area is widely used by walkers, joggers, anglers and cyclists with Duckworth Lane appearing on early 19th Century maps (before the construction of the railway) and is quite possible of very ancient origin. It is especially popular with steam train enthusiasts, photographers and naturalists wishing to access both the ELR and the River Irwell. The lane affords views to the North and South and makes a positive contribution to the Green Belt.

6. Traffic Congestion

A report printed in the Rossendale Free Press (14/9/2018) stated that traffic congestion in Rossendale was the highest (outside major urban conurbations) in the country. During Winter when snow is on the ground Bury Road in the Townsend Fold area is in a state of chaos as residents attempt to park cars on Bury Road due to the impossibility of parking by their own houses. Any development which adds to the number of properties in the area will add to this problem leading to further traffic chaos in and out of Rossendale.

7. Defensibility of existing Green Belt (Criteria for Green Belt Boundary Changes)

(Boundary Change Consultation 2013)

According to the Criteria for Green Belt Boundary Changes amendments to the existing Green Belt will only be made where:

a. Cartographic errors have occurred: or

b. The current boundary defining the extent of the Green Belt is un-identifiable intermittent and or indefensible on the ground.

The current Green Belt boundary is well defined and is totally defensible in its current form. A visual check of the area shows the countryside both clearly identifiable and we understand with no known cartographic errors.

Summary

The Residents of Townsend Fold have consulted with Forward Planning and had discussions with local councillors about proposals and concern over any change to the existing Green Belt for several years and are pleased that the latest proposals in the current plan support this position.

We believe there is an overwhelming argument in support of the proposal to retain the Haslam Farm/Duckworth Lane area of Townsend Fold in the Green Belt and that this proposal will be upheld and form part of the final adopted local plan for Rossendale's Green Belt.

No modifications necessary Please note that separate email has been sent to Rossendale Borough Council Forward Planning department setting down the opinion and items we consider are relevant to the decision that has been made and is in full support of the recommendation included in the plan. This has had to be emailed as a separate file as the software driving this document will not allow it to be uploaded.

Do you wish to participate to the Examination In Public? **No**

Reasons -

Reference **39 Mrs Candice Harwood** - Number of supporters: 17

Commenting on 3.3 Housing supply

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The proposed local plan is not soundly based with regard to the site no SHLAA16172 with regard to the Strategic Housing land Supply assessment (2018 update) ,pages 483-485inclusive and for the reasons stated in the accompanying critique (Please see appendix)

Removal of site SHLA16172 from within the prposed Urban Boundary and its removal as a housing site

Do you wish to participate to the Examination In Public? **Yes** Reasons **So that the matter can be fully considered**

Reference	53 Mr	Clive	Balchin	James Trickett & Son Ltd	Number of supporters:
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Commenting on	3	Housing Supply
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Online survey:

The emerging local plan is not sound with regard to site no SHLAA16172 in the Strategic Housing Land Availability Assessment (2018) report for the reasons set out in the accompanying report

Email:

I would like to make the following comments regarding the above site.

The following from your site report:

Vehicular access: as your initial notes reports the Access requires improvement. There was a planning application on this site in 2003 which was refused due to access problems. I cannot believe that 15 years later with the increased density of traffic on Newchurch Road that they access problems are relieved in any way. It is my belief that this Lane/access can support the existing dwellings and a further seven. I would've thought it was prudent indeed pragmatic that a highways engineers report be obtained. By this I mean not just a cursory visit from the Lancashire County Council engineer and then verbal feedback.

Access by public transport: Immediately outside of the access are two very well used bus stops this only exacerbates the problems with access.

Access to secondary schools: it should be noted that this site is used by many pupils of Alder Grange living in the Newchurch area. Personally, and I know this is not material planning consideration it would be a great shame if this route were denied to them by the development.

Recreational Value: I disagree completely with the comment that this site has no recreational use.

Children accessing the area has already been commented on. It is also widely used by dog walkers and children on mountain bikes who have an informal circuit setup. It should be noted that the second most likely cause of cancer now is obesity anything or area that assists with this must be considered important.

Conclusion–Justification: It is clear that you have identified access as being a problem. And as stated previously I think it would be advantageous to all parties involved if a suitably qualified highways engineer were to prepare a report. At the risk of over egging the putting in application was declined in 2003 due to problems with access therefore I cannot see how 15 years later this problem has gone away.

Additional observations by the writer:

Marl Pits: Putting land ownership to one side, for the average man on the X 43 it would be sensible to consider that this land forms part of the Marl Pits complex. Marl Pits is acknowledged as being the key recreational area for the Borough of Rossendale. In the past there have been plans for a jogging path around Marl pits and this area was included (in fact it would be ideal). It is an interesting area with many mature trees. It would be suitable in the future for “adrenaline pursuits”, something I know the council is interested in. This use might be some way off due to the current economic climate but the idea of this plan is to think long term. It would be a shame purely for reasons of income to the

Council to be short-sighted.

Access via Marl Pits: I have seen it noted that access could be provided through Marl Pits. I must declare an interest as I live facing on tomorrow pits and will attempt not to be a NIMBY. The area that would be used for the access [the netball pitches] has a barrier across it to prevent unauthorised squatters. This makes the area an oasis for children learning to ride their bikes. In fact when there are Bike courses run this is where they are held. Additionally it is also the over spill car park for events at marl pits and is used regularly.

There is also the ongoing issue of traffic congestion at marl pits

To allow access for seven residences across marl pits would be detrimental to all users now and in the future.³

Flooding - whilst not a material planning consideration the north end of the site abutting marl pits can get severely flooded and is very boggy indeed when we experience adverse weather.

Conclusion

I believe this area should not be zoned for residential but should be retained as Amenity/Leisure. A hackneyed point to some, and perhaps not totally relevant to this point. If I was the cabinet member for development my priority would be to target the brownfield sites and not focus on the low hanging fruit. Theresa May yesterday announced plans to release 15 Billion pounds to local authorities for social housing.

I would like to thank you for taking the time to read these observations.

Remove site SHLA17162 from the Urban Boundary and from the list of sites considered suitable for future housing development

Do you wish to participate to the Examination In Public? **Yes**

Reasons To ensure I communicate effectively my objection to this land being included in the

Reference **75 Mrs Anne Hardiman**

-

Number of supporters:

Commenting on 3

Land availability

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

Please see submittd planning statement

Site SHLA16196 should be included within the Urban Boundary

Do you wish to participate to the Examination In Public? **Yes**

Reasons To make representations

Reference **79 Mr P Ramsden Linden Park Developments Ltd** Number of supporters:

Commenting on - Policy SD2

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

It is acknowledged and supported that all new development in the borough should take place within the Urban Boundaries, which are defined on the Policies Map, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area. However, it is imperative that the Council fully undertakes a detailed assessment of sites outside of the defined urban boundary to ensure that all sites with potential or which have a historic planning permission are included within the boundary. Sites that fall within the latter category can have the effect of reducing the overall amount of greenfield land that will need to be allocated for development. This is the case with regard to a site off Lindon Park Road, Ewood Bridge, Haslingden which benefits from a historic but implemented and still extant planning permission. The emerging Local Plan proposes the site to be included within a wider zone of Green Belt when it should be allocated for housing development, by reference to its planning history.

By email:

To Whom This Concerns

The Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 17, 19, 20, 35 Statement of Representations Procedure, Rossendale Local Plan

We write in connection with the consultation on the Rossendale Borough Council Draft Local Plan, specifically the representations made on behalf of our client Phil Ramsden of Lindon Park Developments Ltd (...), in relation to a housing development.

The representations concern a number of policies outlined in the Draft Local Plan mainly regarding housing, all of which are linked to the Representor's main objective which is to seek the reallocation of its site at Ewood Bridge from Green Belt to a housing allocation. This is driven by the fact it benefits from an extant permission for housing.

Connected with the above, I attach a legal opinion referred to in the representations and the Site Plan. I also attach the representations submitted via the Councils online system. The policies of which I have referred to are listed below;

- Policy SD2 Urban Boundary and Green Belt
- Policy HS1 Meeting Rossendale's Housing Requirement
- Policy HS2 Housing Site Allocations
- Policy HS4 Affordable Housing
- Policy HS5 Housing Density
- Policy HS6 Housing Standards

All the documents listed above will be shown below in Appendix 1.

The Representor is of the view that the proposed and allocated sites in the Draft Local Plan need to be fully reviewed to ensure unnecessary pressure is not put upon existing urban areas and the associated infrastructure. In addition, a degree of flexibility should be incorporated into policies HS4, HS5 and HS6, with a particular emphasis in ensuring the sustainability and viability of development.

The Representor proposes a change of designation of their site off Lindon Park Road from Green Belt to Housing, which could reduce the pressure on urban areas and their infrastructure and reduce the overall amount of greenfield land which must be allocated for development. Such a change in allocation would be suitable given the extant planning permission for housing which exists on the site and would be particularly useful in meeting housing targets, given the borough's history of poor delivery rates due to lack of suitable, viable and available development sites.

In the first instance, I would be grateful if you could confirm receipt of this letter and the representations it sets out on behalf of the Representor.

As set out in the attached representations, we would be happy to meet to discuss the site and its planning history in more detail and feel that this makes sense given its planning

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history and the role it could play in delivery of the emerging plan's housing strategy.

The Representor proposes a change of designation of their site off Lindon Park Road from Green Belt to Housing, which could reduce the pressure on urban areas and their infrastructure and reduce the overall amount of greenfield land which must be allocated for development. Such a change in allocation would be suitable given the extant planning permission for housing which exists on the site and would be particularly useful in meeting housing targets, given the borough's history of poor delivery rates due to lack of suitable, viable and available development sites.

Do you wish to participate to the Examination In Public? **Yes**

Reasons In order to purvey the above representation in a professional manner, resulting in the best possible outcome for our client.

Reference **94 Mrs L Bower** - Number of supporters:

Commenting on - SD2

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

5. Objection to Policies SD2 and HS2 – Omission of Land south of Hollin Lane

5.1 We object to the omission of the land at Hollin Lane (site ref: SHLAA16184) and its exclusion from the urban boundary.

5.2 The site was allocated in the Part 2 Local Plan in 2015 as well as the Regulation 18 Local Plan in 2017. Representations were made at both stages supporting the allocation.

Copies are enclosed as Appendix 3.

5.3 However the site is not allocated in the current version. We had no contact from the Council on the site or its intended removal from the plan. Having contacted the Council we were advised that the site was removed as an allocation from the local plan due to site access issues. However at no stage were we advised that this was an issue or a request that we provide further information to address any concerns. The allocation at the previous stage was based on the same access arrangements and therefore we see no justification for the site's exclusion at this stage. Indeed the access arrangements have not changed from those when the site was allocated for development, along with the land to the north of Hollin Lane (SHLAA Ref: SHLAA16392). The land to the north is not in the control of our client but what is clear is that until this late change Hollin Lane was deemed appropriate to both sites to deliver circa 51 dwellings (HS2.44).

5.4 Our client has agreement from LCC Highways on the access and the following is attached:

- Appendix 4 is the plan that is approved in principal;
- Appendix 5 is the written approval from LCC; and,
- Appendix 6 is an up to date letter confirming that the verges are part of the adopted highway enabling the work to be carried out as per the approved plan.

5.5 We have seen no evidence that the site cannot be accessed or any evidence that contradicts the written agreement of LCC. We note that the Highway Capacity Study was only published on 2nd October 2018, some 3 days before the consultation closes. That in itself raises an issue with the lawfulness of the consultation. For this site there is no reference to Hollin Lane in any event to contradict the agreed position with LCC.

5.6 The extract of the SHLAA is Appendix 7. This confirms that subject to access, the site is suitable, available and achievable. The Justification states:

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

5.7 As noted earlier access is agreed and the Council has proceeded on an erroneous basis. We can confirm that the site is capable of making a full contribution to housing land supply in the borough in the short term. It is located in an accessible location adjacent to the settlement boundary, and is surrounded by residential development to the west and partly to the north, a farm complex to the east, and a brook runs along the southern boundary with Alder Grange Community College to the south. The site represents a logical rounding off opportunity. A number of trees and planting is located along the brook, and would form the basis of a defensible urban boundary as part of a landscaping scheme.

5.8 Our client controls the site and we can confirm that it is achievable and immediately available for development. They are in active discussions with developers in order to bring the site forward. The site is considered to be suitable for development, and there are no technical or environmental constraints. Further detailed site specific work would be considered further as part of any future application.

5.9 We therefore request its reinstatement as an allocated site.

We therefore request the reinstatement of our clients site as an allocated site.

Do you wish to participate to the Examination In Public? **Yes**

Reasons For the reasons set out we consider that the site should be reinstated as an

allocation

Reference **96 Mr Paul Williams** - Number of supporters:
 Commenting on - Green belt removal in Edenfield
 Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

The plan is unsound in its failure to demonstrate the exceptional circumstances necessary to remove land from Green Belt in Edenfield.

Provide sound evidence of the exceptional circumstances for the removal of Green Belt in Edenfield set against the reduction in dwelling numbers from the original plan, change of use of Brownfield sites from dwellings to employment from the original plan, dwellings from small developments, and the number of currently empty dwellings in Rossendale.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	101 c/o Agent	c/o Agent	c/o/ Agent	The Methodist Church	Number of supporters:
Commenting on	-		SD2		
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate? Yes
Please see attached Representations Statement					

3.0 Policy SD2: Urban Boundary and Green Belt

3.1 Policy SD2 identifies land which is proposed to be removed from the Green Belt to accommodate future development needs. The Methodist Church agree with the Council that all possible alternatives have been considered and that 'exceptional circumstances' exist to justify the release of Green Belt land in accordance with paragraph 136 of the NPPF.

3.2 We therefore consider Policy SD2 to be positively prepared, justified, consistent with national policy and therefore 'sound' in accordance with the tests set out under paragraph 35 of the NPPF.

3.3 The existence of 'exceptional circumstances' is demonstrated through the Council's evidence base and can be summarised as follows:

Duty to Co-operate

3.4 The national standard methodology for calculating housing needs has identified a minimum figure of 212 new homes per year in Rossendale over the plan period. For the reasons we set out in our representations to Policy SS1, we consider this housing figure should be treated as an absolute minimum at this stage. The Council have worked with neighbouring Councils and none have offered to accommodate any of Rossendale's housing requirement. This is confirmed in the Duty to Cooperate and Statement of Common Ground (August 2018).

3.5 Accordingly the Local Plan accords with Paragraph 137 of the Framework, and as required by Paragraph 35, the Local Plan must seek to meet the area's objectively assessed need within the Borough.

Lack of Deliverable Brownfield Sites

3.6 As set out in the Council's Housing Topic Paper (August 2018), and in accordance with the guidance in Paragraph 137 of the Framework, the Council has undertaken extensive additional work since the publication of the Regulation 18 Local Plan consultation to identify additional brownfield sites capable of delivering housing and to increase densities proposed on sites which are included in the existing supply wherever possible. The proportion of housing allocations on Greenfield sites has been decreased and the average density of development on the proposed brownfield sites increased (paragraph 3.5.3 and 3.5.4 of the Housing Topic Paper, August 2018).

3.7 However, this work has confirmed that there is a lack of available and deliverable brownfield sites across the Borough as a whole to meet the overall housing requirement during the Plan period, such that it is necessary to look outside of the urban areas.

Lack of non-Green Belt Land outside of the Urban Area

3.8 As set out in the Strategy Topic Paper (August 2018) and the Green Belt Topic Paper (August 2018) prepared by the Council to inform the Local Plan, 23% of the Borough is designated as Green Belt and less than 10% lies within the urban area. In addition to the expansive areas of Green Belt, Rossendale also faces several environmental constraints to development. It is characterised by extensive areas of moorland, which restrict development due to topography and landscape impact. There are also a number of environmental designations such as the West Pennine SSSI and South Pennine SPA which further limit the areas suitable for development.

The Need for a Balanced Approach to Supply

3.9 We also support the recognition on Page 15 of the Regulation 19 draft Local Plan of the 'need for a balanced portfolio of sites within the Borough that reflect need; are attractive to the market and address past under-delivery, particularly for housing'. As well as the need to find sites which are suitable and deliverable from a technical point of view, the Local Plan must also provide a range types and sizes of sites in different locations across the Borough to ensure a flexible and deliverable supply of sites. This is

essential to ensure an adequate distribution of development to meet needs. It will also ensure the Local Plan is not overly reliant on the deliverability of a few key sites and has the flexibility to adapt to changing market circumstances over the plan period.

Viability

3.10 The evidence base (for example the Green Belt Topic Paper, 2018) describes how viability is also an essential constraint shaping the Spatial Strategy in Rossendale, with low values for residential development in the eastern parts of the Borough bringing the deliverability of strategic housing growth here into doubt.

3.11 There is therefore strong justification for identifying housing allocations in those areas with higher values (Edenfield and the south west of Rossendale) even though this necessitates the release of some Green Belt land. Not only do the higher values increase the certainty that the sites in these areas will be delivered but, as the Green Belt Topic Paper (August 2018) also points out, it means there is sufficient value in developments to fund affordable housing and other infrastructure improvements. This is considered in more detail in our representations to Policy HS3 in relation to proposed allocation H72: Land West of Market Street.

Summary on Exceptional Circumstances

3.12 In light of the above factors, we agree that fully evidenced and justified 'exceptional circumstances' exist which justify the proposed alterations of the Green Belt boundaries in Rossendale. It is clear the Council have fully reviewed all other reasonable options for meeting its identified development need. The draft Local Plan still seeks to direct the vast majority of development within the urban boundary (68%) and on greenfield land outside of the Green Belt (20%), thereby proposing only the remaining 5% of the housing sites to be released from the Green Belt. This amounts to less than 1% of the total Green Belt in the Borough, which is considered wholly justified in the light of the above considerations.

3.13 We consider the specific case for Green Belt release in relation to proposed allocation H72: Land West of Market Street, in our response in relation to Policy HS3.

Please see attached Statement prepared by Nexus Planning

Do you wish to participate to the Examination In Public? **Yes**

Reasons As landowners of part of 'Major Site' H72: Land West of Market Street, the Methodist Church consider it is important to have the opportunity to participate in the examination in support of the allocation of the site.

Reference	105 Mr Antony Greenwood	-	Number of supporters:
Commenting on	-	SD2	

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I am pleased that my land at the rear of 198 Haslingden Road Rawtenstall has been brought out of the Green Belt but I would like to request that it be brought into the Urban Boundary as directly across from my land on the opposite side of the dual carriage way there is some major development underway and feel like this should be taken into consideration

To free up more land for future housing in an area that is already under heavy development

Do you wish to participate to the Examination In Public? **Yes**

Reasons To give my point of view if necessary.

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

SD2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support SD2 and note Examples would include farm diversification or certain types of tourism uses. But does this mean farms becoming almost inset villages in the Green Belt as proposed 2016/0424 Pleasant View Farm housing in Holcombe – located just outside the Green Belt to the west of Holcombe Road. RCT also note Rossendale’s “protected areas” within the unparished areas (c) Containing the settlements of Haslingden, Rawtenstall and Bacup - 2009 No. 2098 HOUSING, ENGLAND The Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009. It’s intended to stop affordable rural social housing being lost.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5148****Edenfield Community Neighbourhood Forum**

Number of supporters:

1213

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy SD2: Urban Boundary and Green Belt

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy.

17. We consider that the Local Plan and Strategic Policy SD2 to be unsound in relation to its approach to Green Belt and particularly the proposed release of Green Belt land in Edenfield.

18. Green Belt Exceptional Circumstances, as required by the NPPF, have not been demonstrated by the Council and there are a number of methodological and assessment errors with the Green Belt Review evidence base. We provide our detailed comments on this below.

Exceptional Circumstances

19. The importance of protecting and securing the Green Belt around Edenfield is part of the current policy of the RBC Development Plan The 2011-2026 RBC Core Strategy (November 2011) identified that Edenfield would be an 'Area for Green Belt Review'. Policy 1 of the Core Strategy identified that a review of the existing Green Belt boundaries would be undertaken as part of the Site Allocations DPD. This review would only be limited to small scale changes and cartographic corrections that do not adversely impact on the purposes of including land in the Green Belt.

20. The Site Allocations and Development Management Policies Plan Document was withdrawn in February 2016 so this review never took place, The Green Belt Review in the Core Strategy was clearly only concerned with small scale changes and cartographic corrections and did not intend for the removal of 'strategic' sites from the Green Belt. Therefore, it is unclear from the Local Plan or from the Green Belt Topic Paper what changed in the intervening period between preparing its Site Allocations and Development Management Policies Plan Document that made RBC consider it had exceptional circumstances that warranted the strategic release of Green Belt in Edenfield. We are aware that this time coincided with Taylor Wimpey acquiring a significant amount of the land within the proposed allocation in this plan (Parcel 43 of the Green Belt Review).

21. The National Planning Policy Framework (NPPF) is clear that Green Belt boundaries should only be altered in 'exceptional circumstances' however Rossendale appear to have failed to consider whether it has exceptional circumstances or what these exceptional circumstances might be until it prepared its Green Belt Topic Paper when it published its Regulation 19 Local Plan.

22. ECNF requested that RBC provide verbally and in writing what its exceptional circumstances were during our meeting with RBC on 13th March 2018 and on subsequent occasions. The Council's purported exceptional circumstances were not available to the Councillors when it voted to proceed with the Regulation 18 Local Plan in 2017 or when it voted to agree the Regulation 19 Local Plan on 11th July 2018.

23. The Green Belt Topic Paper prepared by the Council is inadequate and fails to demonstrate exceptional circumstances in Rossendale. It lists nine reasons that it has exceptional circumstances:

- 1) To meet housing land requirements through a balanced approach to supply
- 2) Address past under-delivery
- 3) Provision of a balanced employment portfolio in suitable locations for the market
- 4) To enable a balanced approach of housing and employment
- 5) Provide a good mix of housing types across the Borough
- 6) Viability
- 7) Other authorities are unable to meet housing / employment need
- 8) Improving the Green Belt

24. Without dissecting each of these reasons individually, it is clear that the reasons RBC provides for exceptional circumstances are actually basic requirements of the NPPF.

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25. Green Belt should only be released in 'exceptional circumstances' with the National Planning Policy Framework (2012) Paragraph 83 stating that "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."

26. The changes to the meet its development needs (including suitable brownfield sites, underutilised land, the optimisation of development density and statements of common ground with neighbouring authorities).

27. There is no reason why these national policy requirements from NPPF 2018 should not apply to Rossendale and their Local Plan regardless of when the Local Plan is submitted. These are sound planning principles regardless of whether the Plan is submitted under NPPF 2012 or 2018.

28. We draw your attention to the recent Secretary of State's direction to East Hertfordshire District Council regarding the halting of the adoption of the East Hertfordshire Local Plan (see Appendix 2) due to proposed Green Belt release. The Secretary of State's direction appears to align with this added scrutiny of proposed Green Belt release.

29. We provide a few key paragraphs from the NPPF (2018) in relation to how Green Belt should be approached in Local Plans:

- "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans."11
- "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:
 - a) makes as much use as possible of suitable brownfield sites and underutilised land;
 - b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
 - c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."12
- "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

30. The *Calverton Parish Council v Nottingham City Council* (see Appendix 3 to these representations) provides a number of tests for what should be considered and 'grappled with' before an LPA determines whether it has exceptional circumstances.

31. The Hon. Mr Justice Jay concluded that having an objectively assessed need does not amount to 'exceptional circumstances':

"it would be illogical, and circular, to conclude that the existence of an objectively assessed need could, without more, be sufficient to amount to "exceptional circumstances" within the meaning of paragraph 83 of the NPPF." (Paragraph 50)

32. In that case, Mr. Justice Jay concluded that having undertaken the first stage of assessing objectively assessed need; the local authority should at least identify and then grapple with a number of matters as a minimum. These matters are set out below together with the full text:

"In a case such as the present it seems to me that, having undertaken the first-stage of the Hunston approach (sc. assessing objectively assessed need), the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

- the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent."

33. Whilst RBC's Green Belt Topic Paper refers to this case it has not 'grappled' with these steps and importantly has critically not undertaken the 'staged approach' from the Hunston15 case which Mr Justice Jay refers to in his Judgement. In Hunston, the Court of Appeal: "...endorsed a two-staged approach to the application of paragraph 47 of the NPPF.

The first stage is to reach a conclusion as to the "full objectively assessed needs for market and affordable housing". This is a purely quantitative exercise. The second stage involves an exercise of planning judgement (in relation to development control or the formation of a local plan, as the case may be) as to whether the policy constraints in the NPPF carry the consequence that the objectively assessed needs should not be met."

34. We deal with RBC's objectively assessed needs in relation to Policy HS1 in these representations, however it is important to explain here that the quantum of housing RBC is planning for has decreased since its previous draft Local Plan which was based on the Council's SHMA (2016) with the current draft Local Plan being based on the Government's standardised methodology. These housing needs are set out below (2019-2034):

- Rossendale Draft Local Plan (Regulation 18 draft) Policy HS1: At least 4,000 dwellings (265 dwellings per annum)
- Rossendale Draft Local Plan (Regulation 19 draft) Policy HS1: At least 3,180 dwellings (212 dwellings per annum)

35. Therefore, its stated housing requirement has decreased by 820 dwellings and when the earlier Local Plan made allocations, for what it considered to be suitable sites, for an additional 442 dwellings than what its Regulation 19 Local Plan is planning for.

36. The Regulation 18 Local Plan made allocations for 3,622 dwellings¹⁶. The Council's Core Strategy has a target of 247 dwellings per annum which considerably more than that set in the draft Local Plan. The Council's Authority Monitoring Report (AMR)¹⁷ shows that the Council has delivered 938 new dwellings between 2012-2017 which equates to 188 dwellings per year as an average with the Council delivering 265 dwellings in the 2013/14 monitoring year.

37. On this basis alone the 'trigger' (the second stage of the Hunston test) for considering whether the Council has exceptional circumstances should not have been engaged. As we set out under Policy HS1 in these representations, the latest household projections indicate a downward trend in housing need for RBC further raising the question as to why RBC considers its OAN is of such an acuteness and intensity to warrant considering releasing the Green Belt. The reasons the Council provides for exceptional circumstances are basic requirements of plan making in the NPPF.

Green Belt Review (2016)

38. We have analysed the Rossendale Green Belt Review (LUC) (2016) which supported the emerging Local Plan. We query how robust / reliable their site visits were when considering the assessment for Parcels 39, 43 and 44 (which form part of the draft HS2.71 allocation). We query a number of the parcel assessments made in the Green Belt Review where we consider there to be inconsistencies throughout the study. Parcels 39, 43 and 44 form part of the proposed allocation of the Local Plan and we have assessed these in turn below.

39. It is important to note that Purpose 1 was split into two sub purposes: Purpose 1a (whether land has already been affected by sprawl and whether it retains an open character) and Purpose 1b (the potential for urban sprawl to occur in the absence of Green Belt designation). Only parcels in settlements which abut the large built up area of Greater Manchester have been considered under purpose 1 for this study, which have included Parcels 34, 39, 43 and 44 (which all scored Moderate under both Purpose 1a and 1b). Clearly these areas which were assessed under Purpose 1 are more 'at risk' given their proximity to the large built up area of Greater Manchester. This is a factor which has not been properly taken into consideration in the findings of the Review.

Figure 3 – Blackburn Road facing West/South-West facing towards A56 (Source: Google)

40. Parcel 39 of the Green Belt Review has been recommended for removal in the study. This parcel forms part of the draft Policy HS2.71. As assessed in Appendix 4.1 of the Green Belt Review, the site scored 'Moderate' with regards to Purpose 1 (to check unrestricted sprawl of large built-up areas) and Purpose 3 of the Green Belt (to assist in the safeguarding of the countryside from encroachment). With regards to Purpose 1, LUC also considered that "the A56 dual-carriageway defines the western boundary and detracts from the sense of openness in parts". The A56 'boundary' is also referenced in the assessment under Purpose 3. Whilst a 'satellite view' might suggest that the A56 forms a boundary, the reality on the ground due to topography and key public views reveals that this is not the case on the ground. The assessment of this site under Purposes 1 and 3 should be 'Strong'. The parcel proposed for removal contributes to the openness and permanence of the Green Belt at this location.

Figure 4 - Market Street facing West towards A56 (Source: Google)

41. Parcel 43 of the Green Belt review has been recommended for removal in the study. This parcel forms part of the allocation in Edenfield. Figure 4 above is a Google Street View image taken from Market Street looking west towards the A56. As assessed in Appendix 4.1 of the Green Belt Review, the site scored 'Moderate' with regards to Purpose 1 (to check unrestricted sprawl of large built-up areas) and Purpose 3 of the Green Belt (to assist in the safeguarding of the countryside from encroachment). The assessment made the same judgements on the A56 relating to the impact on the Green Belt with regards to Purpose 1 and 3 of the Green Belt as in Parcel 39. However, more so than with Parcel 39, this photo does not clearly identify this boundary; instead showing a rural area which appears to have the key Green Belt characteristic of being 'open'.

Figure 5 – Exchange Street facing west towards A56 (Source: Google)

42. This parcel is located to the south of Parcel 43. This site can be assessed in a similar way to that of 39 and 43, however it scored 'Weak' under Purpose 3. As with Parcel 39 it is considered that there would be an encroachment into the countryside and the A56 does not form a defensible boundary. Therefore, it is considered that this site should also score 'Strong' under Purposes 1 and 3. Assessment process

43. In addition to Parcel 43, Parcels 17, 21, 26, 29, 30, 31, 32, 33, 35, 39, and 44 have been recommended for removal in the Green Belt Review. Figure 6 identifies these parcels and their assessments. Parcels 22 and 28 have also been shown below, however these have not been recommended for removal from the Green Belt in the Local Plan and their scores are used as a comparison against those which have been recommended for removal. There appears to be inconsistency in the method for areas recommended for removal.

Figure 6: Assessment of Green Belt Parcels (Source: LUC Green Belt Review 2016).

44. Table 4.3 of the of the Green Belt Review identifies the degree of potential harm to the Green Belt if the parcels in question were to be released. Table 4.2 of the Green Belt Review identifies the definition of harm.

Figure 7: Framework for assessing harm (Source: LUC Green Belt Review 2016 Table 4.2)

Figure 8: Degree of Harm by Green Belt Parcels for HS2.71 (Source: LUC Green Belt Review 2016 Table 4.3)

45. Therefore, taking into consideration Figures 7 and 8 above, only Parcels 21 and 33 identified in Figure 4 score as 'Low' harm for removal. All remaining parcels scored a 'Moderate' harm for removal, including all Green Belt parcels which make up the area for the proposed strategic allocation in Edenfield. It is also not clear why Parcels 22 and 28 were not recommended for removal, given these Parcels scored less favourably in the Green Belt Review than Parcel 43 (given Parcel 43 contained two 'Moderate' scores compared to one each for Parcels 22 and 28).

46. Therefore, as Parcels 39, 43 and 44 should be rated as 'Strong' under Purpose 1 and 3 (following our assessments on 39, 43 and 44) the potential harm caused by release of the parcels would be considered 'High'. However, it is also considered that this assessment process identified in Figure 7 is not consistent with the resultant recommendations for those parcels recommended for removal from the Green Belt – as Parcels 39, 43 and 44 have all been recommended for removal from the Green Belt despite their release considered to have a 'Medium' degree of harm on the Green Belt.

47. The Green Belt which surrounds Edenfield village is very much linked to the functional Green Belt surrounding Manchester and is critical to the protection against sprawl and ensuring that the designated Green Belt land remains open.

48. This Green Belt is valued by local residents and forms a key part of the village's linear character and identity. Rossendale Borough Council has proposed this strategic release of Green Belt which would result in a population increase for Edenfield in excess of 50%.

Do you wish to participate to the Examination In Public? Did not answer Reasons

Reference	5150 Mr	Alan	Ashworth	Number of supporters:
Commenting on			SD2	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>I object to Rossendale Borough Council's Regulation 19 draft Local Plan on the basis that it is Unsound, it is Not Consistent with National Planning Policies and the Strategy adopted is Not Justified.</p> <p>In particular I object to Strategic Policy SS relating to Edenfield and Strategic Policy SD2 and Policy HS2 (in so far as they relate to site H72) and Policy HS3.</p> <p>The following evidence is supplied to support my claims:-</p> <p>1) The Council have failed to demonstrate any "Exceptional Circumstances" that would justify the release of Land from the Green Belt in the Borough and therefore the proposal is contrary to National Planning Policy. Furthermore they appear to have overlooked the fact that Housing Need in itself is not an Exceptional Circumstance. My comments on the specific points they raised under Exceptional Circumstances in their Green Belt Topic Paper are as follows:-</p> <p>a) To meet Housing Land Requirement through a balanced approach to supply. The Borough's target has been reduced from 3975 to 3180 for the fifteen year period from 2019-2034, a reduction of twenty percent. The new figure of 3180 equates to ten percent of the existing stock of homes in the Borough. In Edenfield there is to be an increase of approximately forty-seven percent to the Housing number, in comparison with the ten percent for the Borough as a whole, and this will double the built-up area of Edenfield and increase its population by fifty percent. The infrastructure is already under great pressure and the highways have been identified as being a major issue. How could this be considered to be a balanced approach to supply?</p> <p>b) Address past under-delivery. This can surely not be considered to be a reason to release land from the Green Belt when the Council can simply reclassify empty employment sites for residential purposes. For example the Stubbins Vale Mill site could accommodate close to half of the total housing proposed on land in the Green Belt and the Council are aware that the site owners are interested in developing it for residential purposes. Part of this site is available now, the remainder will become available in 2019, before the Plan takes effect, and the majority of the infrastructure is in place to enable easy deliverability. This option and similar ones that are available should be used to meet the need to address the previous under delivery without taking land from the Green Belt for this purpose.</p> <p>c) Provision of a balanced employment portfolio in suitable locations for the market. Whilst it is accepted that some of the extensions to the employment sites proposed in the Plan are sensible, for example NE1 to NE5 and M1 to M5, the Council need to re-examine their Employment Site List, include the numerous Sites that have been omitted and collate accurate figures on vacancies in terms of Offices, Retail Premises and Industrial Units on existing sites before taking the easy option of using Green Belt Land. The existing Employment Site Allocation list is inaccurate, sites are missed off the list and some of the site measurements are incorrect. (Refer to Appendix 1 section 3a & 3b.)</p> <p>d) To enable a balanced approach of housing and employment. The Council have already identified more sites than are required to meet the future needs of the Borough for Employment and they have admitted that several sites have not been carried forward from the previous plan due to poor demand, or where sites are considered to be suitable for other development, including Residential. (Refer to page 54 in the Rossendale Draft Local Plan, Pre-Submission Publication Version, Regulation 19 Consultation and sections 1c, 3a & 3b in Appendix 1.)</p> <p>If the sites that are not being carried forward were to be reviewed in an objective manner they would provide a far more balanced approach that would also eliminate any perceived need to use Green Belt land for housing.</p> <p>e) Provide a good mix of housing types across the Borough. There is reference in section 1 of the Exceptional Circumstances (Green Belt Topic Paper, Part 7) to the large site at</p>				

Edenfield (H72) being able to contribute to a balanced housing supply by ensuring a mix of housing types and sizes, including affordable provision. This surely cannot in any way be considered as an exceptional circumstance when a good mix of housing types can just as easily be achieved on the larger Brownfield Sites available such as Stubbins Vale Mill. Green Belt Land should not be considered for release, while Brownfield sites are available.

f) Viability. The Council are putting forward an argument for Developers to sell properties (mainly four/five bedroom homes) at a premium price in Edenfield. The high values achievable, they say, would help to fund infrastructure. (Refer to page 25 in the Green Belt Topic Paper.) The infrastructure issues can be similarly funded from the construction of higher density housing on Brownfield sites such as those identified in item (e) above. The fact that values for residential development in the south-west of the Borough are higher than in other parts can hardly be described in any way shape or form as an exceptional circumstance.

g) Other Authorities are unable to meet housing /employment need. There is no need to seek assistance from other Authorities. The Council are aware that there are more than sufficient Brownfield and Mixed Sites to cover the needs identified for both Housing and Employment in Rossendale; they just need to reclassify the Brownfield sites that have not been listed. Again why they consider this to be an exceptional circumstance is difficult to comprehend. (Refer to 1c, 3a & 3b in Appendix 1.)

h) Improving the Green Belt. Policy HS3e (improving access to Green Belt land) is referred to stating that it will be “particularly important with respect to the land to the west of Market Street in Edenfield”. The Green Belt Topic Paper further states that “the developers of this site will be required to identify how they will address this issue.” I am at a loss as to how this could possibly be conceived to be an exceptional circumstance - any problems that arise will only be brought about by allowing building on the Green Belt. If the Green Belt is maintained and all new housing development takes place on the Brownfield and Mixed Sites, this is not an issue.

i) Other Issues Raised. A56 Border and Master Plan Scheme. These are two issues that should not have been taken into account. The A56 does divide the Green Belt in Edenfield into easterly and westerly portions, but the possibility of its being an alternative boundary is no justification for removing the easterly portion from the Green Belt. It is not exceptional for a road to run through the Green Belt. The same applies to the Masterplan Scheme, the opportunity to Masterplan the sites does not provide justification for removing it from the Green Belt. Any large undeveloped or cleared site can be master planned.

j) BC's Conclusion. (Section 8 of the Green Belt Topic Paper.) I would robustly challenge the Council's conclusion that after their examination of “a wide range of sites being considered and the potential for Brownfield land and higher densities given detailed examination” that it is still necessary to have to release Green Belt land for housing. There are many alternatives available to the Council and these are listed in Appendix 1 sections 1c, 1d, 1e, 1f, 3a and 3b. It is also apparent that the Council are keeping their options open on some of the Brownfield sites with their comments in the fourth paragraph of page 54 in their Pre-Submission Publication document.

2) The Strategy that Rossendale Borough Council have followed is not justified because it has not taken into account any reasonable alternatives.

I believe there are sufficient developable Brownfield Land/Sites and other Sites within the Borough to satisfy the Housing Need without the need to release Land from the Green Belt. This statement is based on the facts gained from examination of the Regulation 19 Plan and comparison with the Regulation 18 Plan and noted below:-

a) The Brownfield and Mixed Site List issued on 26th June 2018 was compared with the previous list issued in July 2017 and it was noted that twenty-one Sites with the potential for 656 homes had been removed that were previously considered to be developable or deliverable or viable. The reasons for the removal include Landscape Impact, Access Issues, Topography and the possibility that they are more suitable for Employment Use. (Refer to item 1c in Appendix 1.) The Landscape Impact comments are truly amazing when the Council have chosen to ignore similar comments made by their own Consultants Penny Bennett Associates with respect to part of the Green Belt Land they

are proposing to release in Edenfield. The comment was:-“NOT SUITABLE FOR DEVELOPMENT ON LANDSCAPE”. (Refer to Appendix 3.) Additionally, the majority of those twenty-one re-classified sites failed to make it to the Employment Site Allocations List and are now presumably in the group referred to on Page 54 of RBC’s Pre-Submission Publication document. The relevant comment passage is:

“Following recommendations in the ELR, several employment site allocations and sites have not been carried forward from the previous plan primarily due to poor demand or where sites are considered to be better suited for other development, including residential. This is in line with the Framework, which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.”

b) An analysis of the Housing Site Allocation Lists issued in July 2017 and August 2018 highlights that 595 homes have been removed due to Highway Issues, Access, Flood Risk and Contamination etc when only twelve months previously they were considered to be acceptable. This represents close to seventeen percent of the homes identified on the July 2017 HSA list being removed. Surely this is excessive culling by any stretch of the imagination and needs to be re-examined? (Refer to item 1d in Appendix 1.)

c) A further analysis of the HSA July 2017 and August 2018 lists highlights that on fifteen sites the Council have reduced the density of homes, resulting in an additional loss of 189 homes when they should have been looking to optimise site density rather than use Green Belt. This is contrary to Paragraphs 122 and 123 of the National Planning Policy Framework. Other Site changes have resulted in a loss of a further twenty homes, making 209 in total. (Refer to items 1e and 1f.)

d) The Council’s Employment Site Allocation List at pages 51 to 53 of the draft Local Plan has been examined and found to be outdated and inaccurate with long-established Employment sites being missed off. They calculated a target of 27ha for projected growth for B1, B2 and B8 uses. (We cannot determine the breakdown of this particular figure or how it has been derived because we are still awaiting the publication of their Employment Land Review.) They have however identified 28ha for growth without including the Brownfield Sites that they reclassified from Housing to Employment Use and we estimate these to be close to 20ha. (More than sufficient to cover the Housing Need without having to use Green Belt Land.) (Refer to items 3a and 3b in Appendix 1.)

e) In the Green Belt Topic Paper produced by the Council there are only five Housing sites proposed and they are as follows:-

H 69 Cowm Waste Water Treatment Works 20 homes.

H 70 Irwell Vale Mill, Irwell Vale 45 homes

H 71 Edenfield Land East of Market Street 9 homes.

H 72 Edenfield Land West of Market Street. 400 homes.

H 73 Edenfield - Around Edenwood Mill / Wood Lane. 47 homes.

This gives a total of 521 homes proposed in the Green Belt of which 456 are in Edenfield. (87.5%). The developments proposed for Edenfield will virtually double the built up area for the village and increase the population by more than fifty percent.

f) Empty Homes. Statistics provided by Lancashire County Council highlight that there were 1,188 empty homes in Rossendale in 2017, and serious consideration must be given to including a proportion of these before releasing valuable and irreplaceable land from the Green Belt. This option has been utilised by the Authority for Burnley which is an adjacent Borough. (Refer to Appendix 2.)

g) Small Sites. The Council have identified 2,853 of the 3,180 homes target but they have not included the sites with five or less houses referred to as Small Sites. The shortfall is 327 which equates to 21.8 homes per annum. The Council have achieved this target in the past from the Small Sites and there is little doubt it can be achieved in the future. They have also not included “windfall developments” such as Hawthorn House which occur from time to time. Note the Small Site numbers only represent ten percent of the

total number of homes involved.

Conclusion. It will be apparent from the alternatives listed above that there were many choices available to Rossendale Borough Council to achieve easily the reduced target of 3,180 homes without resorting to the use of Green Belt Land. The difficulty is in trying to understand why they have chosen to ignore the facts and just blindly ploughed ahead with a proposal to destroy Village life in Edenfield, change it forever and utilise vast swathes of its valuable and irreplaceable Green Belt.

Furthermore they have failed to follow National Planning Policies or provide any justifiable Exceptional Circumstances.

I strongly recommend that they be instructed to re-examine the real possibilities outlined in items 2a, 2b, 2c, 2d, 2f and 2g but this time with a positive view based on the NPPF guidelines.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5151 Mr Brian Scholes** Number of supporters:

Commenting on SD2

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

I would Also.

Like to give my support to Change for inclusion in the Urban Boundry at Delph House Scout road Scout bottom Waterfoot BB4-9JS

Do you wish to participate to the Examination In Public? **No** Reasons

Reference **5156 Mr Michael Bernard Murphy** Number of supporters:

Commenting on SD2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir / Madam,

Re: Consideration of Land East of Lower Clowes Road (west of Lomas Lane), Rawtenstall (your ref HS2.68), for Inclusion Within New Urban Area and Boundary

With reference to the above land and your current consultation relating to the Rossendale Draft Local Plan.

On behalf of my Client, Mr. Michael Bernard Murphy, the owner of the above mentioned land, I confirm that should the land be included within the new Urban Area and Boundary, my Client's intention would be to progress a deliverable housing scheme, with the aim of supporting Rossendale Borough Council to meet their target for deliverable housing schemes.

Please do not hesitate to contact me should you have any queries, or require additional information, regarding this land.

Yours sincerely

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Safeguarded land

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Paper 1:

6. Safeguarded land

6.1 In accordance with paragraph 139 of the NPPF, it is necessary for the Council to consider the need to designate safeguarded land (to be removed from the Green Belt) to meet potential development requirements beyond the plan period.

6.2 The designation of safeguarded land is a critical step in ensuring the Green Belt can endure in the long term, and reflecting its intended purpose and permanence, in accordance with paragraph 133 of NPPF. Any consideration of whether safeguarded land is needed it should be approached with a view to ensuring a further review of the Green Belt is not required following the current plan period.

6.3 In respect of Rossendale, it is accepted by the Council that exceptional circumstances exist to justify the release of land from the Green Belt during the current plan period. This is necessitated by the imperative of meeting the Borough's development needs and the relative absence of non-Green Belt opportunities to achieve this in a sustainable manner. Only in the unlikely event that the Borough's future housing requirements fall substantially below the current plan requirements would the need to call on further Green Belt land to meet development requirements beyond the plan period be avoided having regard to the relative paucity of the developable urban land supply.

6.4 In this case, the specific circumstances of the PSLP justify a further release of land from the Green Belt to be safeguarded specifically to meet development needs beyond the current plan period. Most notably, the Council's strategy to 'focus first' on brownfield sites within the urban capacity is likely to exhaust 'developable' reserves during the Plan period, which will only serve to reduce the supply of non-Green Belt land beyond the Plan period.

6.5 In light of these conclusions, it is patent that the Council's failure to address the need for safeguarded land is contrary to the tests of soundness in the NPPF. The Council have failed to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period as required by the NPPF.

6.6 To address this, it is recommended that additional land is removed from the Green Belt and allocated as safeguarded land. The calculation of the safeguarded requirement may be based on rolling forward the housing need figure which is adopted as part of the emerging Local Plan and replicating the Green Belt and non-Green Belt split. Using the housing requirement and allocations favoured by the Council, this is set out as follows: (please see appendix)

6.7 In reality, the safeguarded land requirement will be significantly higher than this since:

- a) The proper annual housing requirement is higher than proposed in the PSLP (see section 4);
- b) The total proportion of the overall housing requirement to be met through the release of land from the Green Belt is significantly higher than assumed by the Council and expressed through the PSLP due to deficiencies in the developable supply identified through these representations (see section 5).

6.8 Peel is of the view the Council's safeguarded land requirement is based on rolling forward the housing need figure which is adopted as part of the emerging Local Plan and replicating the Green Belt and non-Green Belt split. Increasing the housing requirement and the allocation of Green Belt sites will therefore result in a need to allocate more safeguarded land.

Safeguarded land – summary and assessment of soundness

6.9 In summary, contrary to the prevailing evidence and guidance in the NPPF, the Council has failed to properly consider the need to release further land from the Green Belt for safeguarding purposes and to provide a supply of land to call on to meet the Borough's development needs beyond the plan period. The Council's approach means that a further review of the Green Belt is likely to be required as part of the development of the next Local Plan, undermining the long term permanence of the Green Belt as is its defining characteristic (NPPF paragraph 133).

6.10 The failure to make adequate provision for safeguarded land presents a conflict with national policy, including paragraphs 133 and 139 of the NPPF. This aspect of the PSLP is unsound as a result.

SD2: Urban Boundary and Green Belt

9.3 Policy SD2 identifies the sites to be released from the Green Belt to meet development requirements over the plan period. Elsewhere within this representation, Peel has set out its view that additional sites need to be released from the Green Belt to meet the full development needs of the Borough over the plan period and to provide a supply of land (safeguarded) to meet development needs beyond the plan period.

9.4 The final paragraph of Policy SD2 states that 'The Council will expect that the design of development on the above sites minimises the impact on "openness" to the satisfaction of the Local Planning Authority.

9.5 Peel strongly objects to the above requirements and does not consider these to be necessary or justified. Paragraph 133 of the NPPF notes that 'openness' and 'permanence' are the essential characteristics of the Green Belt. Once released from the Green Belt, sites will no longer form part of the Green Belt and will not be subject to Green Belt policy controls and restrictions. There is no justification for seeking to minimise the impact of their development on openness, since they will not form part of the Green Belt upon being developed and indeed this would place a significant constraint on the development capacity of these sites, undermining the Local Plan's ability to deliver its development requirements. Other design and landscape policy considerations will apply to these sites which will ensure that the schemes brought forward are appropriate to their setting and context, including their relationship with retained open land in the wider area.

Paper 4: Identification of Safeguarded Land Requirements

Please see appendix.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

SD2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy SD2: Urban Boundary and Green Belt

2.1 This policy confirms that land has been removed from the Green Belt on the basis that exceptional circumstances exist, with 8 sites proposed for release, including Taylor Wimpey's other land interest at Land West of Market Street, Edenfield.

2.2 We fully support the release of suitable sites from the Green Belt, as it reflects the Council's evidence base, which demonstrates that the authority area is highly constrained, by topography, ground conditions and other issues, meaning that there is insufficient suitable and viable non-Green Belt land to meet the Borough's needs in full.

2.3 We also welcome the Council's acknowledgement that exceptional circumstances exist, as Paragraph 136 of the revised NPPF (July 2018) confirms that green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

2.4 In our view, the combination of increased housing need (both market and affordable) and insufficient supply, and the harm that will occur from failing to meet these needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; generates the exceptional circumstances required for Green Belt release in Rossendale, and the Council do set out these circumstances in more detail in the supporting Green Belt Topic Paper.

2.5 Paragraph 137 of the revised NPPF introduces an additional test for Green Belt release. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, local planning authorities should be able to demonstrate that they have examined fully all other reasonable options for meeting its identified need for development. These include making as much use as possible of suitable brownfield sites, optimising development densities and discussions with neighbouring authorities as to whether they could accommodate some of the identified need of development.

2.6 The Council fully accept that there is insufficient brownfield land, and optimising densities on non-Green Belt sites will not address the acute shortfall in full. The Housing and Green Belt Topic papers confirm that average densities of the 23 proposed brownfield site allocations has been increased to 100 dph, and even when combined with mixed (brownfield/ greenfield allocations) at 85 dph, this will still only deliver a total of 1,117 units; whilst the Council's latest Brownfield Register (dated 15th December 2017) includes 32 sites totalling just 499 units (including several of the proposed allocations so there is double counting with these figures). Either way, it is evident that this level of brownfield capacity falls well short of the 3,180 dwelling target.

2.7 In terms of discussions with neighbouring authorities, a Statement of Common Ground has been published as part of the Council's evidence base for the Regulation 19 Consultation. Paragraph 5.8 of the document confirms that:

"All adjoining authorities have been asked if they could consider taking any of Rossendale's housing requirement, or if they were expecting Rossendale to meet their housing needs... No authority came back to Rossendale specifically asking this Council to meet their development requirements, neither have they offered to meet any of Rossendale's needs" 2.8 Whilst it is acknowledged that the emerging Local Plan process is still progressing, it is clear that no adjacent authority is amenable to meeting any of Rossendale's needs. Indeed, section 7 of the August 2018 Green Belt Topic Paper goes one step further, stating that a number of authorities, including the Greater Manchester Combined Authority, have asked if Rossendale was able to meet any of their housing requirements.

2.9 As such, it is clear that all reasonable options have been explored but would fail to meet the emerging development requirements of the Borough. Accordingly, the Local Plan is entirely in accordance with the provisions of the revised NPPF, and further highlights the exceptional circumstances which exist to justify Green Belt release in Rossendale.

2.10 Policy SD2 later states that development will also be expected to contribute to compensatory improvements to land elsewhere in the Green Belt, enhancing both its quality and public access. This reflects the sentiment of paragraph 138 of the revised NPPF, which states that Local Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

2.11 Whilst we are generally supportive of the inclusion of this wording and its accordance with national policy, we are concerned about the supporting text which states that

this could include the identification of land appropriate for Suitable Alternative Natural Greenspace (SANG's). This is further referenced in Policy ENV4 of the consultation document, however no further detail is provided, nor any evidence for this requirement, and its potential impacts on viability, and as such we would ask for urgent clarification on this matter.

LAND WEST OF MARKET STREET, EDENFIELD

Policy SD2: Urban Boundary and Green Belt

2.4 This policy confirms that land has been removed from the Green Belt on the basis that exceptional circumstances exist, with 8 sites proposed for release, including Land West of Market Street, Edenfield.

2.5 We fully support the release of suitable sites from the Green Belt, as it reflects the Council's evidence base, which demonstrates that the authority area is highly constrained, by topography, ground conditions and other issues, meaning that there is insufficient suitable and viable non-Green Belt land to meet the Borough's needs in full.

2.6 We also welcome the Council's acknowledgement that exceptional circumstances exist, as Paragraph 136 of the revised NPPF (July 2018) confirms that green belt boundaries should only be

altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

2.7 In our view, the combination of increased housing need (both market and affordable) and insufficient supply, and the harm that will occur from failing to meet these needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; generates the exceptional circumstances required for Green Belt release in Rossendale, and the Council do set out these circumstances in more detail in the supporting Green Belt Topic Paper.

2.8 Paragraph 137 of the revised NPPF introduces an additional test for Green Belt release matters. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries,

local planning authorities should be able to demonstrate that they have examined fully all other reasonable options for meeting its identified need for development. These include making as much use as possible of suitable brownfield sites, optimising development densities and discussions with neighbouring authorities as to whether they could accommodate some of the identified need of development.

2.9 The Council fully accept that there is insufficient brownfield land, and optimising densities on non-Green Belt sites will not address the acute shortfall in full. The Housing and Green Belt Topic papers confirm that average densities of the 23 proposed brownfield site allocations has been increased to 100 dph, and even when combined with mixed (brownfield/ greenfield allocations) at 85 dph, this will still only deliver a total of 1,117 units; whilst the Council's latest Brownfield Register (dated 15th December 2017) includes 32 sites totalling just 499 units (including several proposed allocations). Evidently, this level of brownfield capacity falls well short of the 3,180 target, even with elevated densities.

2.10 In terms of discussions with neighbouring authorities, a Statement of Common Ground has been published as part of the Council's evidence base for the Regulation 19 Consultation. Paragraph 5.8 of the document confirms that:

"All adjoining authorities have been asked if they could consider taking any of Rossendale's housing requirement, or if they were expecting Rossendale to meet their housing needs... No authority came back to Rossendale specifically asking this Council to meet their development requirements, neither have they offered to meet any of Rossendale's needs."

2.11 Whilst it is acknowledged that the emerging Local Plan process is still progressing, it is clear that no adjacent authority is amenable to meeting any of Rossendale's needs. Indeed, section 7 of the August 2018 Green Belt Topic Paper goes one step further, stating that no neighbouring authorities are able to meet any of Rossendale's emerging housing and employment need, and that a number of authorities, including the Greater Manchester Combined Authority, have asked if Rossendale was able to meet any of their housing requirements.

2.12 As such, it is clear that all reasonable options have been explored but would fail to meet the emerging development requirements of the Borough. Accordingly, the Local Plan is entirely in accordance with the provisions of the revised NPPF, and further highlights the exceptional circumstances which exist to justify Green Belt release in Rossendale.

2.13 Policy SD2 later states that development will also be expected to contribute to compensatory improvements to land elsewhere in the Green Belt, enhancing both its quality

and public access. This reflects the sentiment of paragraph 138 of the revised NPPF, which states that Local Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

2.14 Whilst we are generally supportive of the inclusion of this wording and its accordance with the provisions of national policy, we are concerned about the supporting text which states that this could include the identification of land appropriate for Suitable Alternative Natural Greenspace (SANG's). This is further hinted at in Policy ENV4 of the consultation document, however no further detail is provided, nor any evidence for this requirement, and any impacts on viability, and as such we would ask for urgent clarification on this matter.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons	
Reference	5174	Winfields Holdings Ltd and Winfields Ltd	Number of supporters:
Commenting on	Strategic Policy SD2: Urban Boundary and Green Belt		
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	Yes
		Does the Local Plan complies with the duty to co-operate?	Yes

Winfield support the extension of the urban boundary at Acre to include the brownfield land that forms the northern part of the site upon which its existing business operates. The site is enclosed and not readily discernible from the surrounding area, with the land being excluded from the Green Belt being directly comparable to other land already forming part of the urban area of Acre. As recognised by Officers, this land does not perform any Green Belt function and is a clear continuation of the existing urban area, being distinct and separate from the countryside beyond (as confirmed by the site assessment from June 2017). It does not, therefore, perform the purposes identified by Paragraph 134 of the revised NPPF, as confirmed by the independent reviews undertaken during 2014 and November 2016. Exclusion from the Green Belt would, however, assist the existing business and recognise the status of the land instead, which provides further assurances with respect to its programme of consolidation and renewal within the Haslingden area. A minor adjustment is, however, proposed to include the access from Kings Highway (to the east and coloured in pink and blue on the attached Title Plan). This area not only includes the secondary access but also ancillary structures associated with the historic Mill, making this brownfield land and therefore most appropriately included within the same designation (i.e. excluded from the Green Belt).

Do you wish to participate to the Examination In Public?	No	Reasons
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Reference	5176 Mr	Warren	Hilton	Highways England	Number of supporters:
Commenting on SD2					
Is the Local Plan legally compliant? Did not answer Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer					
<p>'Strategic Policy SD2: Urban Boundary and Green Belt' identifies that some sites will be removed from the Greenbelt due to 'Exceptional Circumstances' and this includes a number of sites which will about the A56. These include:</p> <ul style="list-style-type: none"> •H72 Land west of Market Street, Edenfield; and •NE2 Land north of Hud Hey, Haslingden. <p>If accessibility by active travel and public transport modes is not thoroughly considered from the outset, development sites in the Greenbelt may induce car-dependant travel patterns, in the absence of an alternative mode. Reliable and alternative sustainable modes of travel need to be in place to ensure that the private car is not the dominant form of transport as it will be difficult to change travel behaviour once established.</p> <p>Highways England raised a number of concerns during the Regulation 18 consultation, including the release of sites for development currently situated in the Green Belt, the level of existing congestion and the likely impact of future developments, and vehicular access to specific sites. As a result of these concerns, we note some sites have been removed from the Publication version of the Local Plan. However, despite these concerns and the designated Neighbourhood Forum not supporting the continued inclusion of H27 Land west of Market Street, Edenfield, it remains a housing allocation in the Local Plan. In addition, NE2Land north of Hud Hey, Haslingden remains an employment allocation, contrary to the findings of the Green Belt Review Study.</p> <p>We note the Council has prepared a topic paper setting out the 'Exceptional Circumstances' justifying this Green Belt release. Highways England would welcome consultation on the findings of the highway capacity assessment and the employment sites study, as there remains a lack of robust transport evidence demonstrating the impact of these allocations on the SRN, that suitable accesses can be delivered, or that proposed mitigation measures will support sustainable growth at these sites.</p>					
Do you wish to participate to the Examination In Public? Did not answer Reasons					

Reference	5197 Mr	Marcus	Hudson	Lancashire County Council	Number of supporters:
Commenting on					
Is the Local Plan legally compliant? Did not answer Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer					
<p>Boundary change opposite Goodshaw Parish Church, Goodshaw Lane (3 or 4 houses) – Goodshaw Lane is narrow on this section and experiences on-street parking partly on the grass verge which is a concern. The Highway Authority would seek improvements to address the issues as part of any application that came forward.</p>					
Do you wish to participate to the Examination In Public? Did not answer Reasons					
Acre Avenue, Stacksteads					

Reference **5192**

B&E Boys Ltd

Number of supporters:

Commenting on

Acre Avenue, Stacksteads

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

ACRE AVENUE, STACKSTEADS

Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. This consultation is on the Pre-Submission Version of the Local Plan (Regulation 19) and includes the Draft Local Plan (Written Statement), Policies Map and evidence base.

Hourigan Connolly is instructed by B and E Boys Limited to submit and provide comment on the above site in support of its inclusion within the urban area. We have previously submitted representations in response to the Regulation 18 version of the Draft Local Plan.

A site plan is enclosed for information.

Submissions

We note that within the draft Local Plan land at Acre Avenue, Stacksteads is not proposed to be allocated for a particular use, however it is proposed to be included within the Urban Area.

Our client supports the inclusion of the site within the Urban Area as is indicated on the draft Policies Map. The site is entirely appropriate for inclusion within the urban boundary given the distinction between it and

land further to east which is more open in nature, providing a suitable boundary to the open countryside.

We reserve the right to provide further supporting statements and evidence at the Examination stage of the Local Plan.

TOWNSEND FOLD, RAWTENSTALL

STRATEGIC POLICY SD2: URBAN BOUNDARY AND GREEN BELT

POSITIVELY PREPARED 5.3 The Plan as drafted currently improperly considers the Green Belt credentials of the subject site by failing to assess the discrete characteristics of the relevant Parcel. In doing so it fails to plan for the expansion of a successful employment area in a sustainable location. 5.4 The Plan also identifies certain other employment allocations, which, on the evidence now before the Council, will plainly not come forward, or be retained, for employment use. 5.5 With this in mind, the Local Plan in its current form is not positively prepared and the Council must consider the discrete elements of the identified Green Belt parcels in more detail identify additional development opportunities that may well be currently within the Green Belt but nonetheless represent opportunities for sustainable development.

JUSTIFIED 5.6 Consequently, Strategic Policy SD2 fails to plan for the proper growth of the Borough as it does not identify all available opportunities to meet employment requirements on land that may currently lie outside of the Urban Boundary. This does not represent an appropriate strategy in the case of the subject site and its continued inclusion within the Green Belt is not justified.

EFFECTIVE 5.7 As set out above, the approach to the Green Belt fails to effectively consider the subject site. The approach may lead to an under supply of employment land and the failure of the Plan to deliver. PROPOSED MODIFICATION

5.8 To be consistent with national policy, the Council is respectfully requested to extend the urban boundary so that the site is included within it and removed from the Green Belt.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

EE28 & NE5

Reference **54 Mr John Lord LANXESS Urethanes UK Ltd** Number of supporters:

Commenting on - EE28 & NE5

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

The proposed Green Belt boundary extension includes land within the companies' ownership immediately adjacent to and south of its existing access road. Inclusion of this land within the Green Belt would significantly restrict the potential development of area EE28 and NE5 in that as the site expands vehicle entry to and exit from the site will need to be facilitated and controlled. Entry and exit of large vehicles to the site is often restricted by the parking of vehicles opposite the site entrance despite parking restrictions being in place. To avoid this problem getting worse as the site expands and employs more people it would be beneficial to the Company and all its neighbours if the land immediately south of the existing access road from the end of area NE5 to Rising Bridge Road could be included in NE5. This would enable future development of the site entrance.

We propose that a minor amendment be made to the Urban Boundary - by taking the Urban Boundary line along the south edge of EE27 and continuing it in a straight line across Rising Bridge Road and along side the site entrance road until it meets NE5. This would in effect enable a future possibility to double the width of the site entrance road to facilitate the turning in or out of HGV vehicles and allow the possibility of entrance control which would support business development and employment with a slight reduction in Green Belt area. We believe that the contribution of this area of land to Green Belt principles is very limited and that the impact on achievement of objectives of the Green Belt will be unaffected by this change. Note this objection was made to earlier versions of the local plan but the previous suggested reduction in Green Belt was greater, this modification is more modest and pragmatic.

Do you wish to participate to the Examination In Public? **No** Reasons -

Green Belt boundary

Reference **92 Miss Janet Simpson** - Number of supporters:

Commenting on - Green Belt boundary

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The retention of the Green Belt Boundary at Snig Hole, Helmshore, previously proposed to be moved in the Regulation 18 Consultation (Land at Snig Hole HS2:76), is consistent with guidance in the National Planning Policy Framework (July 2018) Section 13, and various paragraphs therein. I support Rossendale Borough Council's decision to retain it at this location.

NA

Do you wish to participate to the Examination In Public? **No** Reasons **N/A**

M3

Policy SD2 Urban Boundary and Green Belt
M3

Reference **5151 Mr Brian Scholes**

Number of supporters:

Commenting on SD2 M3

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

I would like to have included Ilse of Man Garage and Mill Burnley road east Water BB4-9PLin change of use to Housing Scheme
Please can Isle of Man Garage and Mill BB4-9PL be included in the Housing Scheme

Do you wish to participate to the Examination In Public? **No** Reasons

SD2

Reference **112 Mr L Wrigley**

-

Number of supporters:

Commenting on - SD2 SD2

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

Please see supporting document in relation to Land at Rising Bridge Road (Please see appendix)

Please see supporting document in relation to Land at Rising Bridge Road

Do you wish to participate to the Examination In Public? **Yes** Reasons To enable the inspector to have the opportunity to consider the points made and address questions that may arise.

Number of comments in this section 25

Comments on policy SD3 Planning Obligations

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

SD3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support SD3, and note that some “brownfield” sites have poor road access, as they were served by the natural infrastructure of their location, and abandoned transport systems: Housing Site H68 111 units 3.7Ha 30/Ha at Spring Mill in Whitworth, next to River Spodden and Rochdale to Bacup Railway, for a crow 300m to A671 Market Street’s regular 464 bus service, but 1000m via Wallbank Estate and Hall Street, 00s of houses and schools. So a need to provide a new route into this area. And as mostly inset into Green Belt, instead of an estate layout, a compact urban village, such as Mount Pleasant Village, Nangreaves north of Bury.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

SD3: Planning Obligations

9.6 Peel does not object to the principle of Policy SD3, however it should be noted that any requirement for a S106 contribution will need to be based on clear evidence of need, including that there is insufficient capacity within existing infrastructure to accommodate the development, and be compliant with Regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5197 Mr****Marcus****Hudson****Lancashire County Council**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

ROSSENDALE LOCAL PLAN - REG 19 VERSION: CONSULTATION

Thank you for consulting Lancashire County Council on the Rossendale Local Plan - Reg 19 version: Consultation. LCC has reviewed the information provided and has the following comments:

1- School Planning Team

Lancashire County Council School Planning Team received notification from Rossendale Borough Council of their latest emerging Local Plan consultation. Regulation 19 Pre-Submission Publication Local Plan Version 2019 – 2034. Also included for consultation is the Revised Statement of Community Involvement 2018. It is the intention of School Planning to respond to both consultations within the one response, this will be coordinated by LCC Planning.

Education Strategy

Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. Some children have Special Educational Needs for which they access school provision outside of Lancashire. Special Educational Needs provision is managed by LCC's SEND Team and is not covered by this response. The Strategy for the provision of school places and school's capital investment 17/18 to 19/20 provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and its local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.

Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.

In a letter from the DfE to all Chief Executives, the Minister of State for Housing and the Parliamentary Under Secretary of State for Schools jointly stated that 'where major new housing developments create an additional need for school places, then the local authority should expect a substantial contribution from the developer towards the cost of meeting this requirement.'

The SPT produces an Education Contribution Methodology document which outlines the Lancashire County Council methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers.

In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Councils Home to School Transport Policy.

Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:

- Already over-subscribed,
- Projected to become over-subscribed within 5 years, or
- A development results in demand for a school site to be provided.

Response to the consultation

The School Planning Team has responded to previous consultations leading upto to the present stage, including Regulation 18 October 2017 and the Draft Infrastructure Delivery Plan July 2017. The responses included links to the Strategy for School Place Provision and Capital Investment 15/16 and 17/18. At this point this information was supplied The School Planning Team embarked on consultation of the strategy for 17/18 and 19/20, this is now in place and should be referred to using the link above.

13 December 2018

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The School Planning Team have been in regular contact through the Local Plan process, attending face to face meetings, providing updated information and forecasted pupil projections across the district schools, and providing housing assessments for planning application received, both outline and at reserved matters. Information provided was used in setting out the infrastructure Delivery Plan (IDP) required to support future housing and employment growth. School Planning provided updates through e-mail exchange to be included in the revised IDP August 2018 accompanying the pre-submission Regulation 19. Included were indicative costs of a potential new schools, and additional class rooms on existing schools.

The figures are based on average costs from projects completed across the county by LCC in recent years. The information provided is caveated and any scheme would require full feasibility and cost analysis. The figure of approximately 4 million was based on a standard one form entry primary school. The indicative costs for additional class bases at existing schools is also caveated. The figure would be a guide of a basic standard constructed classroom excluding any additional facilities including toilets/ cloakrooms and storage.

The situation reported on for the Regulation 18 consultation remains fluid across the district and the planning areas used by School Planning to forecast future need. Primary Schools are grouped into 5 distinct planning areas.

- Bacup and Stacksteads
- Rawtenstall
- Haslingdon
- Ramsbottom
- Whitworth

Reported in 2017, the situation of a projected shortfall remains the same for the areas of Rawtenstall and Ramsbottom within the next 5 years. The area of Whitworth is already showing a shortfall across the planning area. Haslingdon, Bacup and Stacksteads show there to be a level of capacity across the planning area, however individual schools may be operating at their net capacity.

The district remains under review with advice from LCC School Admissions Team taken into consideration of plans to mitigate the impact of developments, and other factors impacting school capacity.

The district as a whole is taken for the provision of secondary education with a number of distinct schools including grammar, the response provided in 2017 indicated surplus provision across the district. However, individual schools are operating at their net capacity or above in some cases. The situation one year on remains the same and continues to be monitored.

Expansion of existing schools is still a preferred choice recognising the infrastructure and management already in place. However, potential expansion of any school requires a number of factors to be considered, firstly the school is prepared to expand, and secondly the school has the capacity and land to expand set out by DfE Section 77 of the School Standards and Framework Act 1998.

If a school does not have existing land to facilitate expansion, options of adjacent land could be identified with assistance from the Local Planning Authority (LPA). If this is not possible LCC would look to the LPA for land with the ability to provide a new minimum 1 form entry primary school in the area of need.

At the present time the School Planning Team are not actively seeking a new site for primary or secondary schools. However, in the case of the strategic site at Edenfield in the Ramsbottom planning area, the proposal of approximately 500 new homes would have a significant impact on the immediate schools.

Discussions regarding the strategic site are in the early stages, it is understood that Rossendale planning officers are in discussions with the developers regarding issues and the requirement of master plan for the site. The School Planning Team advised of the impact of such a development to include the addition of a minimum 1 form entry school within the site at Edenfield. The location of a school would be integral to the master plan process.

The School Planning Team welcome the earliest opportunity to engage in the process of master planning process to ensure the financial contributions are secured through s106 agreement, or through Community Infrastructure Levy (CIL) if this is the route chosen by Rossendale BC to secure contributions. It also enables feasibility of a site to ensure the land is suitable, not contaminated or subject to flood risk and that access to the land is in place at the earliest opportunity.

The timing of a new school and the period of time required to plan and delivery to support new housing is crucial to avoid destabilising existing schools, but meet the pupil yield of the early phasing of a strategic development. It is feasible in the early phasing of the strategic site to increase the numbers on roll, potentially as a bulge or permanent basis. Understanding of the masterplan, detailed phasing and bedroom mix will enable The School Planning Team to forecast the point of need.

The locality of the district to neighbouring councils does have an impact on inward and outward migration of pupils, this is more apparent with the secondary schools and selective grammar schools. Colleagues across the Pupil Access team are aware of this and monitor the situation closely with The School Planning Team.

In conclusion, the school Planning Team remain committed to ensuring there are enough places within mainstream schools across the District of Rossendale to reduce the impact of housing development to be delivered, and the external pressures from surrounding districts and those beyond the boundary of Lancashire.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 3

Comments on policy Spatial Strategy Spatial Strategy

Reference **5119 Mr Richard Lester**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer****B UNSOUND**

B1 Not evidence-based: no evidence of exceptional circumstances: contrary to national policy

B1.1 Objection is made to Strategic Policies SS: Spatial Strategy (in so far as it states that growth and investment will be concentrated in Major Sites allocated at Edenfield and New Hall Hey) and SD2 Urban Boundary and Green Belt and Policies HS2: Housing Site Allocations and EMP2: Employment Site Allocations (in so far as SD2, HS2 and EMP2 remove land from Green Belt at H72 Land west of Market Street, Edenfield and NE4

Extension of New Hall Hey, Rawtenstall). Strategic Policy SD2 says that such removal is on the basis that exceptional circumstances exist. The objection is made on the basis that no exceptional circumstances exist and that the LP is thereby unsound and contrary to the National Planning Policy Framework (July 2018) (NPPF).

B1.2 The Explanation of Strategic Policy SD2 includes:

A small number of major changes have been made to the Green Belt boundary, most notably at Edenfield for housing and at Rawtenstall and Haslingden for employment use. "Exceptional circumstances" are considered to exist that justify the proposed releases.

There is a need for a balanced portfolio of sites within the Borough that reflect need; are attractive to the market and address past under-delivery, particularly for housing. A wide range of sites have been considered for development across the Borough, with a focus on brownfield sites and higher densities around town centres. In addition neighbouring authorities have been consulted on their ability to accommodate part of Rossendale's demand. The Green Belt releases have been taken forward following detailed analysis of the non Green belt alternatives.

At Edenfield the justification for Green Belt release particularly relates to the strong defensible boundary of the A56 and the opportunity to masterplan the site to produce a high quality planned housing development that minimises impact on openness. There is strong market demand in the area. For the Green Belt employment sites the challenge of finding suitable employment land reflecting strong market demand close to the A56 corridor as well as meeting the overall employment land requirement, is considered to be an exceptional circumstance.

Masterplanning or for smaller sites, the development of a design framework, will be expected to demonstrate how the design of the scheme minimises impacts on openness such as through the location of development within the site; the scale of the buildings and appropriate landscaping. In order to provide compensatory improvements to the remainder of the Green Belt, developments will be expected to contribute to enhancements to other open space and improved recreational access. This could include the identification of land appropriate for Suitable Alternative Natural Greenspace (SANG's).

B1.3 As demonstrated in the objection by Alan Ashworth, there is no shortage of sites that requires the Council to release land from Green Belt. It is irrelevant that the land proposed to be released from the Green Belt would be attractive to developers.

B1.4 The fact that the Green Belt in Edenfield is divided by a road, the A56, is not exceptional - many roads traverse Green Belt. Nor is it relevant that the A56 would be a strong defensible boundary or an alternative boundary. The plan maker should release land from Green Belt only where it is justified by fully evidenced exceptional circumstances, and not because the maker thinks an alternative boundary would be better or no worse.

B1.5 The opportunity to masterplan a site is not an exceptional circumstance either. Any large site, greenfield or brownfield, wherever located, can be masterplanned. On the logic, such as it is, of the Explanation, any site capable of being masterplanned could be released from Green Belt for development.

B1.6 The Strategy Topic Paper (page 11) refers to site H72 at Edenfield and says it was selected for a range of reasons:

- The proposed housing is deliverable with willing developers and would make a significant contribution to overall housing numbers
- The land is in an area of high viability for housing and proven market demand. This facilitates building but also provides the opportunity for developer contributions to be secured for affordable housing, appropriate infrastructure and a high standard of design and layout.

- Edenfield is close to the M66 and on the X41 bus route so has good accessibility
- It is Local Service Centre
- The Green Belt Review did not consider that the land performed strongly in Green Belt terms

None of those reasons constitutes exceptional circumstances. Nor does the Strategy Topic Paper's assessment (page 12):

However it is considered that, looking at the planning balance, the overall benefits for the Borough outweigh the local impacts and that "Exceptional circumstances" exist for the release of this land for housing. The site will help contribute to addressing past housing under delivery; contribute to a balanced housing supply across the Borough; is viable and contributes to housing mix across the Borough.

B1.7 Paragraph 138 of the NPPF provides:

Where it has been concluded that it is necessary to release Green Belt land for development, plans should . . . set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

The Explanation of Strategic Policy SD2 misinterprets this by providing:

In order to provide compensatory improvements to the remainder of the Green Belt, developments will be expected to contribute to enhancements to other open space and improved recreational access. This could include the identification of land appropriate for Suitable Alternative Natural Greenspace (SANG's).

Identifying land for a SANG or enhancing other open space will not improve the remaining Green Belt.

As well as being unsound for failing to identify exceptional circumstances, these Strategic Policies are unsound for misapplying paragraph 138 of the NPPF.

B1.11 The Green Belt Topic Paper (pages 21 et seq.) includes a section 7. Exceptional circumstances with subsections headed

To meet housing land requirements through a balanced approach to supply

Address past under-delivery

Provision of a balanced employment portfolio in suitable locations for the market

To enable a balanced approach of housing and employment

Provide a good mix of housing types across the Borough

Viability

Other authorities are unable to meet housing/employment need Improving the Green Belt

In my submission whilst those subsections make an argument for developing in the Green Belt they fall far short of demonstrating exceptional circumstances that would justify the release of Green Belt land.

B4. Reasons belatedly produced by the Council to explain removal of land from Green Belt at Edenfield and New Hall Hey do not constitute exceptional circumstances

B4.1 The Council's view, mistaken as it is, of the exceptional circumstances justifying the release of Green Belt land at Edenfield and New Hall Hey is contained in the Green Belt Topic Paper and Strategy Topic Paper, both of which were published long after the LP had been substantially completed.

B4.2 The content of these two Strategy Papers is considered at paragraphs B1.6, B1.11 and

B1.12 above. It suffices to note here that the matters referred to in those Strategy Papers do not constitute exceptional circumstances at all.

Do you wish to participate to the Examination In Public? Yes

Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Spatial Strategy and distribution of housing allocations

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

3. The Spatial Strategy and distribution of housing allocations

3.1 The spatial strategy for the Borough is articulated through Strategic Policy SS. It is delivered principally through Policy HS2 which allocates land for development for housing throughout the Borough.

3.2 The intent of Policy SS is to direct development to the most sustainable locations where it will build on and take advantage of existing concentrations of activity and service provision. This is reflected in the establishment of a hierarchy based approach to distribution, focused on the key service centres and identified major sites first, with growth beyond these locations (at Urban Local Centres, Rural Local Centres and 'other places') being more limited. This represents a sound approach in principle.

3.3 However, Peel does not support Strategic Policy SS as set out and considers this to be unsound in the form presented. Most notably:

☒ Rawtenstall is the dominant service centre within Rossendale and should be defined as such within the hierarchy, reflecting that it represents the most sustainable location for growth. This is overwhelmingly supported by the prevailing evidence base to the PSLP;

☒ A disproportionate level of development is directed towards Bacup due, in part, to deficiencies in Strategic Policy SS and the relative treatment of Rawtenstall and Bacup in this regard. This means that the plan pursues a strategy of seeking to deliver the most development in a location which is evidently less sustainable than the alternative of building on the settlement of Rawtenstall, where possible and viable, as the dominant service centre in the Borough. It also compromises the deliverability of the PSLP and its housing requirement and will exacerbate the continued under provision of affordable housing in the Borough.

3.4 These matters are considered in detail below.

Settlement Hierarchy – the role and status of Rawtenstall

3.5 The proposed Development Hierarchy is established on pages 7-10 of the PDLP and confirmed within Strategic Policy SS: Spatial Strategy. This policy identifies that the Council will focus growth and investment in the Key Service Centres (KSCs), the identified 'major sites', and well located brownfield sites with a view to protecting the landscape, the established built character and the rural areas.

3.6 The KSCs are identified as:

i. Rawtenstall

ii. Bacup

iii. Haslingden

iv. Whitworth

3.7 The Major Sites comprise:

i. Edenfield

ii. Futures Park

iii. New Hall Hey

iv. Carrs Industrial Estate

3.8 The supporting text confirms that Rawtenstall is the Borough's primary centre and is complemented by Bacup, Haslingden and Whitworth which act as KSC's.

3.9 The Strategy Topic Paper⁴ provides further detail on the primacy of Rawtenstall and the status of the other KSCs and states:

"Rawtenstall is identified as the Borough's primary centre within the Development Hierarchy. This reflects the fact that it is the largest settlement in the Borough; is a key nodal point on the road network and is identified as the principle centre in the retail hierarchy. Bacup, Haslingden and Whitworth are Key Service Centres again reflecting their role as the main settlements within their immediate catchment area and their accessibility by bus." (sic)

3.10 The Strategy Topic Paper makes reference to ‘background work’ which informed the development of the hierarchy and that this included as Appendix 1 of the Topic Paper. The document titled ‘Draft Settlement Hierarchy Criteria’ comprises only one side of text and establishes five levels of settlement which appear to be based on key characteristics of sustainability, with Level 1 being the most sustainable.

3.11 The key characteristics of level 1 are highlighted as: Town Centre or District Centre-retail & leisure; leisure facilities; high frequency bus service; range of primary schools; GP’s.

3.12 Rawtenstall is identified within sub-tier 1a of Level 1 with a note which states ‘higher order shops; greater range of bus services’. Bacup, Haslingden and Whitworth are included as sub-tier 1b. No commentary or justification is provided either in the DLP or the Strategy Topic Paper which informs how these rankings were made or how it has impacted on the settlement hierarchy or distribution of development. This is an inadequate evidential base on which to make a key policy decision.

3.13 The emerging plan is proposed to replace the Core Strategy⁵ which was adopted in 2011. Policy 3 of the Core Strategy confirms that the largest number of houses will be built in the Rawtenstall area equating to approximately 30% of the overall requirement (approximately 1,110 houses), whilst a smaller but significant number of additional houses will be built in the towns of Bacup, Haslingden and Whitworth equating to approximately half of the overall housing requirement (approximately 1,850 houses). This is articulated through Figure 3.1 below taken from the Core Strategy.

Figure 3.1: Rossendale Core Strategy Figure 18: Proposed Residential Distribution (Please see Appendix)

Source: Rossendale Borough Council 2011

3.14 The Core Strategy was subject an Examination in Public eight years ago and the aforementioned spatial strategy was deemed to be found to be sound. This spatial distribution was considered to represent a balanced approach, reflective of the relative sustainability of each settlement and their ability to accommodate growth.

3.15 Little has changed in the intervening period to suggest that a fundamental shift away from this strategy is appropriate. No evidence has been provided within the PSLP or the supporting evidence base to justify amending the settlement hierarchy to include settlements other than Rawtenstall in the highest tier.

3.16 Rawtenstall’s status in this regard is reinforced by other aspects of the PSLP. Strategic Policy R1 establishes a Retail Hierarchy and confirms that retail development and other town centre uses, including offices, leisure, arts, culture and tourist facilities will be focused within the defined centres in accordance with the hierarchy. This is set out as follows:

Town Centre: Rawtenstall

District Centres: Bacup, Haslingden

Local Centres: Crawshawbooth, Waterfoot, Whitworth

Neighbourhood Parade: Stacksteads, Helmshore, Edenfield and Facit

3.17 This highlights that in the view of the Council, Rawtenstall functions as a centre at a level higher than the other KSCs in terms of services. This is further confirmed by the Town Centre Study⁶, undertaken by WYG. As part of this study WYG commissioned a survey of 400 households across the study area and included questions on convenience and comparison goods shopping patterns.

3.18 The results confirmed almost 33% of all food trips made by respondents took place in Rawtenstall, 11.2% in Haslingden and only 7.9% in Bacup. In relation to non-food trips, only 20.4% were made to destinations in Rossendale. Of these trips 63% were made in Rawtenstall, 19% in Haslingden and 12% in Bacup.

3.19 As part of the same study WYG also undertook a health check of each centre in December 2016. This sought to identify data such as the overall quantum of floorspace (comprising retail, finance, leisure and vacant units) in the centre, as well as the number of separate units.

3.20 The evidence prepared by WYG, along with the hierarchy established in Policy R1, demonstrates clearly that Rawtenstall functions as the principal centre within the borough with a much greater level of services available to the population. As confirmed by WYG, Bacup, Haslingden and Whitworth are evidently lower order centres which serve a more localised catchment.

3.21 Further, the RBC website provides a profile of the four town centres including information on population as well as a brief settlement profile (https://www.rossendale.gov.uk/info/210200/town_centres). The text estimates the population of the four settlements is as follows:

- Rawtenstall: 23,000
- Haslingden: 16,000
- Bacup: 15,000
- Whitworth: 7,500

3.22 This confirms that the population of Rawtenstall is almost three times the size of Whitworth despite being part of the same tier of settlement.

3.23 The Settlement Hierarchy Criteria included as an appendix to the Strategy Topic Paper places great emphasis on the range of bus services which are available in the various centres. The bus network map for east Lancashire, which is provided at Appendix 1 of this report, confirms that Rawtenstall lies at the heart of the network with almost all major services running through the settlement, including up to 11 services which link the town with Burnley, Accrington, Blackburn, Bolton, Bury, Rochdale and Todmorden. By contrast Bacup has only six services, four of which also serve Rawtenstall.

3.24 To summarise, the above analysis has demonstrated that Rawtenstall is unique in the context of Rossendale being by far the largest and most important service centre in the Borough with all others being relatively small in comparison. It is of Borough-wide significance serving the whole Local Authority area and is evidently the most sustainable location to accommodate the growth requirements of the Local Plan. This was clearly reflected in the Core Strategy in which Rawtenstall was correctly identified as the priority location for growth and as the most sustainable centre in this regard.

3.25 There is no justified reason to deviate from this approach and the Council has not attempted to fully explain this fundamental shift in strategy. The balanced spatial strategy as presented in the Core Strategy should therefore be retained and reflected in the settlement hierarchy set out in Strategy Policy SS. To achieve this Rawtenstall should be identified as a 'Strategic Service Centre' in a tier on its own, with the Key Service Centres of Bacup, Haslingden and Whitworth sitting below this.

3.26 This change will ensure that, through the implementation of the spatial strategy (including allocation of sites and determination of planning applications in accordance with the spatial strategy), development is, where possible, directed to the most sustainable locations where it will benefit from accessibility to services, employment and public transport connections. This is a core planning principle upon which the plan should be based, as required by paragraph 103 of the NPPF.

Distribution of allocations

3.27 The deficiencies in Strategic Policy SS play out through the distribution of residential allocations in Policy HS2.

3.28 The Strategy Topic Paper includes a section on page 9 titled 'How development is distributed' and provides a table which details the distribution of development amongst KSCs. This identifies that the largest proportion of development is to be delivered within Bacup 23%, with Rawtenstall accommodating just 14%.

3.29 This strategy for distribution contrasts greatly with the approach which has been taken with the Core Strategy - one which was found to be sound - and also with the evidence base which has been published with the emerging plan. It runs entirely contrary to the objective of Strategic Policy SS to direct development to the most sustainable locations and does not reflect the status and role of Rawtenstall outlined above. This deficiency originates from the definition of the settlement hierarchy in Strategic Policy SS which, as outlined, has placed Bacup in the same tier as Rawtenstall despite its clear difference in size and role.

3.30 Peel strongly objects to the Council's decision to allocate only 14% of residential dwellings in Rawtenstall. In accordance with its recommendation above, Rawtenstall should accommodate a higher level of development which reflects its proper status and importance in the Borough.

3.31 The only attempt made by the Council to justify its approach is provided at page 10 of the Strategy Topic Paper which points to challenges in identifying a developable supply of land in Rawtenstall. The challenges to delivery of development in Rossendale are recognised, and it would be unreasonable to expect the Local Plan to stick rigidly to a hierarchy in terms of development distribution. A degree of deviation from the hierarchy is fully expected and justified for this reason and in the interests of ensuring a developable supply of housing land can be maintained.

3.32 However, in this instance Peel strongly challenges the Council's claims around the extent to which Rawtenstall is a constrained location, particularly as the Council has decided not to allocate Peel's land at Haslam Farm in Rawtenstall for residential development. Peel's submissions in respect of this site throughout the progression of the Local Plan have demonstrated that this represents a sustainable and developable site.

3.33 This has included the submission of technical evidence to demonstrate that the site is fully deliverable and a scheme which responds positively to any identified constraints

can be progressed. Part of this site was proposed for allocation through the Draft Local Plan. The Council has since withdrawn this allocation without justified reason. This only serves to exacerbate the unsustainability of the spatial strategy set out in directing further development away from Rawtenstall.

3.34 Specific comments on Peel's land at Haslam Farm are provided in Section 7. An updated Development Framework for this site is also submitted as part of Peel's representation to the PSLP.

3.35 Further the Council'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.

3.36 This study shows that development viability in Bacup is marginal. Moreover, affordable housing is not viable in Bacup at all. This contrasts with areas in the west of Borough, including parts of Rawtenstall, Edenfield and Haslingden where the Council's evidence indicates that up to 40% affordable housing is viable. Whilst Peel has a number of comments on this evidence base, appended to Paper 3 of Peel's representations, it agrees with the general position set out regard the relative viability of developing in eastern parts of the Borough compared to the west.

3.37 This evidence base further supports the view that the spatial distribution of allocations is sub-optimal and won't realise the objectives of the plan. Further, the distribution of allocations will evidently not deliver sufficient affordable housing to meet the needs of the Borough. Based on the Keppie Massie Viability Study, and extant permissions, Peel has estimated that the proposed allocations would deliver just 402 affordable homes over the plan period (27 per annum) against an annual need for at least 158 affordable homes (2,370 over the plan period) based on the 2016 SHMA.

3.38 As a combined result of these points, the PSLP's spatial strategy is evidently not the most sustainable compared to reasonable alternatives. It is fundamentally unsound as a result.

Spatial Strategy and distribution of development – summary and assessment of soundness

Strategic Policy SS1

3.39 Whilst seeking to promote a hierarchical approach to the distribution of development according to settlement size and role, the spatial strategy does not reflect the importance and dominance of Rawtenstall and the strategic Borough wide function as the main service centre within Rossendale and the most sustainable location to accommodate development. The Council has failed to present evidence to justify this approach.

3.40 Strategic Policy SS is therefore unsound in its current form. It is not consistent with the NPPF in not representing the most sustainable approach to growth when compared to reasonable alternatives. It is not justified insofar as it runs contrary to the prevailing evidence around the role and function of settlements within the Borough.

3.41 To address this point of unsoundness, Rawtenstall should be defined as a 'strategic service centre' in a tier of its own and the priority location for development.

The spatial distribution of housing allocations (Policy HS2)

3.42 As a result of the deficiencies in Strategic Policy SS, the distribution of housing allocations is unbalanced and does not reflect the logical settlement hierarchy without adequate justification being provided by the Council. Most notably there is an under provision of residential allocations in Rawtenstall, relative to its existing size and role within the Borough and an overprovision of allocations in Bacup.

3.43 Whilst the physical constraints to development in parts of Rossendale are recognised, and would justify some over or under provision in individual settlements relative to their position in the hierarchy in order that the numerical housing requirements of the plan can be met, the extent to deviation from the logical hierarchy is substantial and is not justified at this stage. This is particularly the case in this instance given that there are suitable and sustainable development opportunities in Rawtenstall which are not supported by the PSLP. This includes Peel's land holdings at Haslam Farm, which could be released for development through the Local Plan.

3.44 In this context, the distribution of residential allocations as presented through Policy HS2 cannot be justified and is unsound as a result. It does not represent an appropriate strategy and a sustainable means of meeting the Borough's development requirements compared to reasonable alternatives which exist. It therefore presents a clear conflict with NPPF.

3.45 The distribution of allocations also means that the PSLP will fail to meet, or come close to meeting, the affordable housing needs of the Borough. The allocation of sites in weaker market areas means there is no prospect of delivering affordable housing on the majority of proposed allocations based on the Council's own evidence base. This aspect

of the plan is at odds with paragraph 61 of the NPPF and so is not consistent with national policy. It is unsound as a result.

3.46 To address this point of soundness, additional sites in strong market areas around West Rossendale should be allocated for residential development. This should include seeking to distribute development according to spatial strategy set out in the Rossendale Core Strategy as an approach proven to represent a sound and sustainable strategy. This strategy would be reflective of the sustainability of Rawtenstall as a development location and its status as the dominant service centre within the Borough as well as the viability of development in West Rossendale generally.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5163 Ms Emily Hrycan Historic England** Number of supporters:

Commenting on **Spatial Strategy**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Section - Built Heritage

Comments - As heritage assets are not just built heritage and the Plan covers the historic environment – for consistency it should be amended to read “historic environment” (which would tie in with policy ENV2).

Suggested Amendment - “”Built heritage” should read “Historic Environment”.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section **3**

Comments on policy SS Spatial Strategy

Reference	101 c/o Agent	c/o Agent	c/o/ Agent	The Methodist Church	Number of supporters:
Commenting on	-		SS1		
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate? Yes

1.0 Introduction

1.1 We are pleased to submit, on behalf of our client The Methodist Church, representations in relation to the Rossendale Draft Local Plan Regulation 19 Consultation (August 2018) ('the Regulation 19 Local Plan').

1.2 These representations build upon comments submitted on behalf of the Methodist Church in response to the Regulation 18 Local Plan Consultation in July 2017.

1.3 The Methodist Church own land off Exchange Street in Edenfield and are promoting it for residential development. The Development Statement provided at Appendix A demonstrates how land off Exchange Street represents an available, suitable, achievable site for housing that can be considered deliverable in line with the definition within Annex 2 of the National Planning Policy Framework ('the NPPF') (2018). Accordingly, the Methodist Church support the proposed allocation of the site, along with land to the north, under the proposed 'Major Site' allocation 'H72: Land West of Market Street' in the Regulation 19 Local Plan.

1.4 These representations confirm our view that the Spatial Strategy set out in the Regulation 19 Local Plan, and specifically the allocation of H72: Land West of Market Street, can be considered 'sound' with regard to the tests set out in Paragraph 35 of the NPPF (July 2018). We confirm that land owned by the Methodist Church can be considered deliverable and can come forward as part of the wider proposed allocation H72: Land West of Market Street.

1.5 Our comments specifically relate to the following policies:

- Strategic Policy SS: Spatial Strategy
- Strategic Policy SD2: Urban Boundary and Green Belt
- Strategic Policy HS1: Meeting Rossendale's Housing Requirement
- Policy HS2: Housing Site Allocations
- Policy HS3: Edenfield

2.0 Strategic Policy SS: Spatial Strategy

2.1 We consider the proposed Spatial Strategy contained in Strategic Policy SS to be an appropriate and justified strategy for delivering the identified growth required in Rossendale over the plan period with regard to the specific characteristics and constraints of the Borough.

2.2 In line with national planning policy advice the Spatial Strategy seeks to direct development towards the most sustainable 'key' settlements in the Borough, whilst ensuring some growth is directed elsewhere. It therefore maximises the use of brownfield land in accordance with paragraph 117 of the NPPF, whilst ensuring a good distribution of new development elsewhere to meet needs across the Borough and provide a range of sites to ensure the Local Plan has sufficient flexibility to adapt to changing circumstances.

2.3 It is recognised that the Spatial Strategy has been shaped in large part in consideration of the relatively constrained nature of the Borough. As set out in the Strategy Topic Paper (August 2018) and the Green Belt Topic Paper (August 2018) prepared by the Council to inform the Local Plan, 23% of the Borough is designated as Green Belt and less than 10% lies within the urban area. As well as this expansive Green Belt, Rossendale faces several environmental constraints to development. It is characterised by extensive areas of moorland, which restricts development due to topography and landscape impact considerations. There are also a number of environmental designations such as the West Pennine SSSI and South Pennine SPA which further limit the areas suitable for development.

2.4 In this context, we welcome the Council's proposed Spatial Strategy which appears to achieve an appropriate balance between delivering the growth required and protecting the Borough's environmental and heritage assets. The evidence base documents supporting the Local Plan show how the Council has fully assessed the reasonable alternative options for accommodating the required levels of development, as required by Paragraph 35 of the NPPF.

2.5 In particular, we support the proposed Strategy of allocating a number of 'Major Sites' in suitable sustainable locations. These sites offer an alternative source of housing and

employment land supply in the interests of flexibility. What is more, by delivering a critical mass of development, they can realise significant benefits in the form of planning contributions and infrastructure delivery that smaller sites may be less able to support.

2.6 This Strategy is considered ‘sound’, with regard to the following tests set out under paragraph 35 of the NPPF (2018):

- a) Positively prepared – the Strategy, and in particular the identification of ‘Major Sites’ that are of a significant scale (in terms of recent development in Rossendale) reflects the need to meet the area’s objectively assessed needs over the Plan Period.
- b) Justified – the Sustainability Appraisal and Strategic Environmental Assessment Regulation 19 Report (August 2018) shows how the proposed Spatial Strategy has been identified following an examination of reasonable alternative strategies and has been informed by evidence in relation to the numerous constraints facing the Borough.
- c) Effective – The identification of ‘Major Sites’ as part of the Spatial Strategy, improves the deliverability of the Local Plan and therefore its effectiveness in meeting the identified housing needs and overall growth aspirations of the Council. The Council has recognised that as available, suitable, achievable and deliverable sites, the ‘Major Sites’ represent important opportunities to work with several key landowners to deliver the scale of development required. The delivery of development on ‘larger’ sites presents the opportunity to secure real benefits in terms of high quality design (through the use of Design Codes and Masterplanning), infrastructure contributions and enhancements (which larger schemes can viably support) and control over the phasing of development (through the agreement of Phasing Plans). They are therefore a highly effective way of delivering high quality development over the plan period.

Appendix A: Exchange Street, Edenfield – Development Statement October 2018

Appendix B: Combined Illustrative Masterplan prepared jointly for H72: Land West of Market Street

Do you wish to participate to the Examination In Public?	Yes	Reasons	As landowners of part of 'Major Site' H72: Land West of Market Street, the Methodist Church consider it is important to have the opportunity to participate in the examination in support of the allocation of the site.
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Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
Commenting on		SS			

Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Rossendale Civic Trust support this Strategic Strategy, but notes exclusion of Newchurch, Cloughfold and Balladen, are they to have no change in the Local Plan?

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5148****Edenfield Community Neighbourhood Forum**

Number of supporters:

1213

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy SS: Spatial Strategy

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy.

3. The First Paragraph of Strategic Policy SS states that:

“The Council will focus growth and investment in Key Service Centres, on major sites and on well located brownfield sites whilst protecting the landscape and current built character and rural areas.”

4. The policy then designates the following Key Service Centres explaining that this is where growth and investment will be concentrated:

i. Rawtenstall

ii. Bacup

iii. Haslingden

iv. Whitworth

5. It then goes on to designate the following Urban Local Service Centres stating that “a level of growth and investment appropriate to the settlement size will be encouraged at the following Urban Local Service Centres to help meet housing, employment and service needs”:

i. Waterfoot

ii. Broadley/Tonacliffe

iii. Stacksteads

iv. Crawshawbooth

v. Helmshore

vi. Facit

vii. Stubbins

viii. Britannia

6. Edenfield is not identified in the Local Plan as a Key Service Centre. Edenfield is not in fact identified in the Local Plan as being an Urban Local Service Centre, or a Rural Local Service Centre either. The Local Plan fails to place Edenfield in the settlement hierarchy at all.

However, the Strategy Topic Paper explains that one of the key reasons the strategic allocation was selected at Edenfield was because it is a ‘Local Service Centre’. There is not even a ‘Local

Service Centre’ classification in Strategic Policy SS. The Local Plan explains that ‘Local Service Centres’ “that are close to the Key Service Centre towns and are more urban in character are distinguished from Local Service Centres in more rural locations”. It is unclear what is meant by this.

7. The Strategy Topic Paper states that: “Background work which informed the development of the Hierarchy is attached in the Appendix. The purpose of focussing development in or adjacent to Service Centres is to provide residents with the opportunities to access a range of services as easily as possible, especially for those without access to a car.”

8. The Appendix to the Strategy Topic Paper provides a ‘Draft Settlement Hierarchy Criteria’ (our emphasis). The Hierarchy consists of 5 level of settlements in the hierarchy with Level 1 being the highest order settlement and 5 being the lowest order settlement. The rationale and methodology behind the hierarchy is entirely unclear. It appears to identify ‘sub rankings’ under each level of settlement for instance Rawtenstall has a sub ranking of ‘1a’ within the Level 1 settlement presumably because it has “higher order shops” and a “greater range of bus services” than Bacup, Haslingden and Whitworth which are sub ranked as ‘1b’.

9. Within the Appendix, Edenfield is identified as a ‘Level 3’ because it has a “Local Parade or more than one shop; good quality bus service (around perimeters for Helmshore);

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Primary schools; playing fields”. In terms of Edenfield:

- The draft Criteria does not define what a Local Parade is. We note that the Local Plan Strategic Policy R1 identifies Edenfield as a ‘Neighbourhood Parade’ however it does not define what a Neighbourhood Parade is either.
- In terms of ‘good quality bus service’ it does not define what is considered ‘good’ or ‘quality’. Edenfield has a bus service however it is poor in the late evening so should not be considered as ‘good quality bus service’ however this depends on how this terminology is defined.
- Edenfield (neighbourhood plan area) has one primary school so does not fit the criteria of having multiple primary schools (although this does not restrict entry to village residents).
- Edenfield has only one playing field therefore it does not fit this criterion either.

10. Based on the above analysis and the Council’s criteria, Edenfield should be lower in the hierarchy of settlements. The method for setting the criteria is poorly defined, we therefore reserve the right to comment on any future iterations of the hierarchy criteria prepared by the Council.

11. It is inexplicable based on its own settlement hierarchy why RBC proposes in its Strategic Policy SS the identification of ‘Major Sites’ where will be allocated:

I. Edenfield

II. Futures Park

III. New Hall Hey

IV. Carrs Industrial Estate

12. For avoidance of doubt, all of the proposed Major Site allocations are in or adjacent to Key Service Centres apart from Edenfield. All of the proposed Major Site allocations are proposed for 100% employment uses (apart from Gypsy and Traveller provision at Futures Park). Therefore, a small village which is likely to be distinctly at the lower tiers of the settlement hierarchy has been identified as a suitable location for a Major Site despite not having the services and infrastructure that are required to facilitate major housing development.

13. We have attempted to understand how RBC has come to the conclusion that, in settlement hierarchy terms, Edenfield is suitable settlement to take a ‘Major Site’. We provide a number of quotations from the Local Plan and the Strategy Topic Paper which attempt to explain this with our comments. Given the numerous inconsistencies throughout the documents, the below points are not comprehensive but provide evidence as to the unstructured and illogical approach taken by the Council in selecting its spatial strategy.

“A number of major sites are identified, some of which are outside the urban boundary and or where previously in Green Belt. Their strategic value for development has led to their inclusion in the Plan. These sites reflect, where possible, the priorities of the Council and key partners.”

Comment: What does the Council consider to be ‘strategic value for development’?

Given that this was clearly a key consideration for the Council in deciding to propose the release of Green Belt in Edenfield much further explanation needs to be provided as to why ‘strategic value for development’ meets the Government’s high policy standard for having ‘exceptional circumstances’ to justify Green Belt Release.

Comment: This paragraph states that these sites reflect the priorities of the Council and key partners. Exactly what priorities were key in deciding which ‘major sites’ were allocated? The site selection process does not appear to be evidence led. What priorities are embodied within the Edenfield sites proposed for allocation? Finally, which ‘key partners’ is the Council referring to?

“The land is immediately adjacent to Edenfield which though a discrete settlement in functional terms forms an extension of the large built up area of Ramsbottom in neighbouring Bury MBC. The opportunities for high quality, Masterplan led development are considered to outweigh the effect of the scale of the proposed development on a designated Key Service Centre.”

Comment: This statement is about Edenfield forming an extension of the large built up area of Ramsbottom is unfounded (see map below). Edenfield is not an extension of Ramsbottom and Ramsbottom is on its own not a ‘large built up area’ even in the Council’s own Green Belt Study.

Figure 1: Existing Green Belt in Edenfield and Surrounding Area

Source: <http://troyplanning.com/project/green-belt-map/>

Comment: The statement that the opportunity for a high-quality masterplan led development outweighs the effect of the scale of the proposed development on a designated Key Service Centre needs to be clarified by the Council. This seems to suggest that the strategic release of Green Belt at Edenfield was chosen as it has the opportunity for high quality masterplan led development which is to be favoured by the Council over the effect of development in Key Service Centres.

14. The Strategy Topic Paper (see Figure below) states the reasons why the site was selected. We address each of the bullet points and address the other points such as Green Belt exceptional circumstances elsewhere in our representations.

“The proposed housing is deliverable with willing land owners and would make a significant contribution to overall housing numbers”:

- Any housing site being deliverable with willing land owners is not unique. Furthermore, there is no evidence to suggest the site is ‘deliverable’ in line with the NPPF definition for deliverability. The Council has provided no evidence in respect of site deliverability. The Strategy Topic Paper is selective in terms of the infrastructure section which although it identifies £0.2 million to improve the Edenfield mini roundabout (not including land, utilities, demolition costs) fails to set out some of the other estimated costs associated with the development from its own evidence base which we summarise below.

- The Topic Paper and the Local Plan fail to set out the infrastructure costs set out in the Council’s Infrastructure Delivery Plan (2018). The IDP states that:

- o Lancashire County Council (LCC) have indicated that if the planned development at Edenfield goes ahead they may require either a school extension or a new school with a new school cost estimate in the region of £4 million. It states that a new primary school would be a Free School and not maintained by the education authority. It is unclear where this cost estimate is derived from and what the logic is in terms of any new school being a Free School and not maintained by the education authority.

- o There are geotechnical issues with the A56 embankment in Edenfield that would need to be addressed in any adjacent development proposals. The IDP provides no further information than this however the geotechnical issues should be considered in much greater detail by the LPA before suggesting that the site is suitable and deliverable.

- o In respect of the Edenfield roundabout scheme referred to above, the IDP states the following.

“the schemes at Edenfield, Toll Bar and Waterfoot are challenging to implement because of the constrained urban environment. All the junctions are likely to become at capacity towards the end of the Plan period. Further work is being undertaken by the developers’ consultants to look at options for Edenfield”

- o It is particularly concerning that a) the Council consider improvements to the Edenfield roundabout to be challenging (as well as their description of Edenfield as a constrained urban environment) b) the junction is ‘likely’ to be at capacity towards the end of the plan period c) the Council is reliant on the developers’ consultants to “look at options for Edenfield”. Apart from it being entirely unclear what options the developers are looking at for Edenfield in respect of the roundabout, the Council’s reliance on a third party with a clear conflict of interest to provide crucial evidence for the Local Plan is unacceptable.

“The land is in an area of high viability for housing and proven market demand. This facilitates building but also provides the opportunity for developer contributions to be secured for affordable housing, appropriate infrastructure and a high standard of design and layout:

- The viability evidence for the Local Plan is out of date and not fit for purpose as these representations already set out therefore the Council has no evidence to support the claims it makes. “Edenfield is close to the M66 and on the X41 bus route so has good accessibility.”

- Edenfield does not have access to M66 (entry or exit). The X41 service is not guaranteed medium and long term. Bus operators have removed the service in the past due to traffic congestion in Edenfield.

- We question and challenge the simplicity of the Council’s statement as a reason for selecting this area for strategic development. If more consideration went into this reason for site selection then the Council should have set it out here.

“It is a Local Service Centre”

- As these representations already explain, Edenfield is not identified as a Local Service Centre in the Local Plan or in the Strategy Topic Paper so this statement is inaccurate.

“The Green Belt Review did not consider that the land performed strongly in Green Belt terms”

- We address Green Belt matters under Policy SD2. However, we consider this statement that the Green Belt Study considered that the land did not perform strongly in Green Belt to be misleading and inaccurate.

“Only the southern part of the site is supported by the Landscape Study”

- This is a simplistic, misleading and inaccurate statement which we address later in our representations.

Figure 2: Excerpt from Strategy Topic Paper Page 11

15. We note an inaccuracy in the Local Plan. The supporting text of the Local Plan states the Borough is covered by 20% Green Belt whereas the Topic Paper states that it is covered by 23% Green Belt⁹. One of these must be inaccurate. The Topic Paper states that most of the Green Belt is concentrated in the south west of the borough however we consider that the communities in the north west and south east of the borough, including Whitworth, may feel they have been left out of this description given that both of these areas have a significant amount of Green Belt as well.

16. Additionally, in this Paper the Council has only identified 2,853 of the 3,180 homes target but has not included the sites with five or less houses referred to as ‘Small Sites’. The shortfall is 327 which equates to 21.8 homes per annum. The Council has achieved this target in the past from ‘Small Sites’ and there is little doubt it can be achieved in the future. They have also not included ‘windfall developments’ such as Hawthorn House which occur from time to time. Note the ‘Small Site’ numbers only represent 10% of the total number of homes involved.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5150 Mr	Alan	Ashworth	Number of supporters:
Commenting on			SS	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>I object to Rossendale Borough Council's Regulation 19 draft Local Plan on the basis that it is Unsound, it is Not Consistent with National Planning Policies and the Strategy adopted is Not Justified.</p> <p>In particular I object to Strategic Policy SS relating to Edenfield and Strategic Policy SD2 and Policy HS2 (in so far as they relate to site H72) and Policy HS3.</p> <p>The following evidence is supplied to support my claims:-</p> <p>1) The Council have failed to demonstrate any "Exceptional Circumstances" that would justify the release of Land from the Green Belt in the Borough and therefore the proposal is contrary to National Planning Policy. Furthermore they appear to have overlooked the fact that Housing Need in itself is not an Exceptional Circumstance. My comments on the specific points they raised under Exceptional Circumstances in their Green Belt Topic Paper are as follows:-</p> <p>a) To meet Housing Land Requirement through a balanced approach to supply. The Borough's target has been reduced from 3975 to 3180 for the fifteen year period from 2019-2034, a reduction of twenty percent. The new figure of 3180 equates to ten percent of the existing stock of homes in the Borough. In Edenfield there is to be an increase of approximately forty-seven percent to the Housing number, in comparison with the ten percent for the Borough as a whole, and this will double the built-up area of Edenfield and increase its population by fifty percent. The infrastructure is already under great pressure and the highways have been identified as being a major issue. How could this be considered to be a balanced approach to supply?</p> <p>b) Address past under-delivery. This can surely not be considered to be a reason to release land from the Green Belt when the Council can simply reclassify empty employment sites for residential purposes. For example the Stubbins Vale Mill site could accommodate close to half of the total housing proposed on land in the Green Belt and the Council are aware that the site owners are interested in developing it for residential purposes. Part of this site is available now, the remainder will become available in 2019, before the Plan takes effect, and the majority of the infrastructure is in place to enable easy deliverability. This option and similar ones that are available should be used to meet the need to address the previous under delivery without taking land from the Green Belt for this purpose.</p> <p>c) Provision of a balanced employment portfolio in suitable locations for the market. Whilst it is accepted that some of the extensions to the employment sites proposed in the Plan are sensible, for example NE1 to NE5 and M1 to M5, the Council need to re-examine their Employment Site List, include the numerous Sites that have been omitted and collate accurate figures on vacancies in terms of Offices, Retail Premises and Industrial Units on existing sites before taking the easy option of using Green Belt Land. The existing Employment Site Allocation list is inaccurate, sites are missed off the list and some of the site measurements are incorrect. (Refer to Appendix 1 section 3a & 3b.)</p> <p>d) To enable a balanced approach of housing and employment. The Council have already identified more sites than are required to meet the future needs of the Borough for Employment and they have admitted that several sites have not been carried forward from the previous plan due to poor demand, or where sites are considered to be suitable for other development, including Residential. (Refer to page 54 in the Rossendale Draft Local Plan, Pre-Submission Publication Version, Regulation 19 Consultation and sections 1c, 3a & 3b in Appendix 1.)</p> <p>If the sites that are not being carried forward were to be reviewed in an objective manner they would provide a far more balanced approach that would also eliminate any perceived need to use Green Belt land for housing.</p> <p>e) Provide a good mix of housing types across the Borough. There is reference in section 1 of the Exceptional Circumstances (Green Belt Topic Paper, Part 7) to the large site at</p>				

Edenfield (H72) being able to contribute to a balanced housing supply by ensuring a mix of housing types and sizes, including affordable provision. This surely cannot in any way be considered as an exceptional circumstance when a good mix of housing types can just as easily be achieved on the larger Brownfield Sites available such as Stubbins Vale Mill. Green Belt Land should not be considered for release, while Brownfield sites are available.

f) Viability. The Council are putting forward an argument for Developers to sell properties (mainly four/five bedroom homes) at a premium price in Edenfield. The high values achievable, they say, would help to fund infrastructure. (Refer to page 25 in the Green Belt Topic Paper.) The infrastructure issues can be similarly funded from the construction of higher density housing on Brownfield sites such as those identified in item (e) above. The fact that values for residential development in the south-west of the Borough are higher than in other parts can hardly be described in any way shape or form as an exceptional circumstance.

g) Other Authorities are unable to meet housing /employment need. There is no need to seek assistance from other Authorities. The Council are aware that there are more than sufficient Brownfield and Mixed Sites to cover the needs identified for both Housing and Employment in Rossendale; they just need to reclassify the Brownfield sites that have not been listed. Again why they consider this to be an exceptional circumstance is difficult to comprehend. (Refer to 1c, 3a & 3b in Appendix 1.)

h) Improving the Green Belt. Policy HS3e (improving access to Green Belt land) is referred to stating that it will be “particularly important with respect to the land to the west of Market Street in Edenfield”. The Green Belt Topic Paper further states that “the developers of this site will be required to identify how they will address this issue.” I am at a loss as to how this could possibly be conceived to be an exceptional circumstance - any problems that arise will only be brought about by allowing building on the Green Belt. If the Green Belt is maintained and all new housing development takes place on the Brownfield and Mixed Sites, this is not an issue.

i) Other Issues Raised. A56 Border and Master Plan Scheme. These are two issues that should not have been taken into account. The A56 does divide the Green Belt in Edenfield into easterly and westerly portions, but the possibility of its being an alternative boundary is no justification for removing the easterly portion from the Green Belt. It is not exceptional for a road to run through the Green Belt. The same applies to the Masterplan Scheme, the opportunity to Masterplan the sites does not provide justification for removing it from the Green Belt. Any large undeveloped or cleared site can be master planned.

j) BC's Conclusion. (Section 8 of the Green Belt Topic Paper.) I would robustly challenge the Council's conclusion that after their examination of “a wide range of sites being considered and the potential for Brownfield land and higher densities given detailed examination” that it is still necessary to have to release Green Belt land for housing. There are many alternatives available to the Council and these are listed in Appendix 1 sections 1c, 1d, 1e, 1f, 3a and 3b. It is also apparent that the Council are keeping their options open on some of the Brownfield sites with their comments in the fourth paragraph of page 54 in their Pre-Submission Publication document.

2) The Strategy that Rossendale Borough Council have followed is not justified because it has not taken into account any reasonable alternatives.

I believe there are sufficient developable Brownfield Land/Sites and other Sites within the Borough to satisfy the Housing Need without the need to release Land from the Green Belt. This statement is based on the facts gained from examination of the Regulation 19 Plan and comparison with the Regulation 18 Plan and noted below:-

a) The Brownfield and Mixed Site List issued on 26th June 2018 was compared with the previous list issued in July 2017 and it was noted that twenty-one Sites with the potential for 656 homes had been removed that were previously considered to be developable or deliverable or viable. The reasons for the removal include Landscape Impact, Access Issues, Topography and the possibility that they are more suitable for Employment Use. (Refer to item 1c in Appendix 1.) The Landscape Impact comments are truly amazing when the Council have chosen to ignore similar comments made by their own Consultants Penny Bennett Associates with respect to part of the Green Belt Land they

are proposing to release in Edenfield. The comment was:-“NOT SUITABLE FOR DEVELOPMENT ON LANDSCAPE”. (Refer to Appendix 3.) Additionally, the majority of those twenty-one re-classified sites failed to make it to the Employment Site Allocations List and are now presumably in the group referred to on Page 54 of RBC’s Pre-Submission Publication document. The relevant comment passage is:

“Following recommendations in the ELR, several employment site allocations and sites have not been carried forward from the previous plan primarily due to poor demand or where sites are considered to be better suited for other development, including residential. This is in line with the Framework, which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.”

b) An analysis of the Housing Site Allocation Lists issued in July 2017 and August 2018 highlights that 595 homes have been removed due to Highway Issues, Access, Flood Risk and Contamination etc when only twelve months previously they were considered to be acceptable. This represents close to seventeen percent of the homes identified on the July 2017 HSA list being removed. Surely this is excessive culling by any stretch of the imagination and needs to be re-examined? (Refer to item 1d in Appendix 1.)

c) A further analysis of the HSA July 2017 and August 2018 lists highlights that on fifteen sites the Council have reduced the density of homes, resulting in an additional loss of 189 homes when they should have been looking to optimise site density rather than use Green Belt. This is contrary to Paragraphs 122 and 123 of the National Planning Policy Framework. Other Site changes have resulted in a loss of a further twenty homes, making 209 in total. (Refer to items 1e and 1f.)

d) The Council’s Employment Site Allocation List at pages 51 to 53 of the draft Local Plan has been examined and found to be outdated and inaccurate with long-established Employment sites being missed off. They calculated a target of 27ha for projected growth for B1, B2 and B8 uses. (We cannot determine the breakdown of this particular figure or how it has been derived because we are still awaiting the publication of their Employment Land Review.) They have however identified 28ha for growth without including the Brownfield Sites that they reclassified from Housing to Employment Use and we estimate these to be close to 20ha. (More than sufficient to cover the Housing Need without having to use Green Belt Land.) (Refer to items 3a and 3b in Appendix 1.)

e) In the Green Belt Topic Paper produced by the Council there are only five Housing sites proposed and they are as follows:-

H 69 Cowm Waste Water Treatment Works 20 homes.

H 70 Irwell Vale Mill, Irwell Vale 45 homes

H 71 Edenfield Land East of Market Street 9 homes.

H 72 Edenfield Land West of Market Street. 400 homes.

H 73 Edenfield - Around Edenwood Mill / Wood Lane. 47 homes.

This gives a total of 521 homes proposed in the Green Belt of which 456 are in Edenfield. (87.5%). The developments proposed for Edenfield will virtually double the built up area for the village and increase the population by more than fifty percent.

f) Empty Homes. Statistics provided by Lancashire County Council highlight that there were 1,188 empty homes in Rossendale in 2017, and serious consideration must be given to including a proportion of these before releasing valuable and irreplaceable land from the Green Belt. This option has been utilised by the Authority for Burnley which is an adjacent Borough. (Refer to Appendix 2.)

g) Small Sites. The Council have identified 2,853 of the 3,180 homes target but they have not included the sites with five or less houses referred to as Small Sites. The shortfall is 327 which equates to 21.8 homes per annum. The Council have achieved this target in the past from the Small Sites and there is little doubt it can be achieved in the future. They have also not included “windfall developments” such as Hawthorn House which occur from time to time. Note the Small Site numbers only represent ten percent of the

total number of homes involved.

Conclusion. It will be apparent from the alternatives listed above that there were many choices available to Rossendale Borough Council to achieve easily the reduced target of 3,180 homes without resorting to the use of Green Belt Land. The difficulty is in trying to understand why they have chosen to ignore the facts and just blindly ploughed ahead with a proposal to destroy Village life in Edenfield, change it forever and utilise vast swathes of its valuable and irreplaceable Green Belt.

Furthermore they have failed to follow National Planning Policies or provide any justifiable Exceptional Circumstances.

I strongly recommend that they be instructed to re-examine the real possibilities outlined in items 2a, 2b, 2c, 2d, 2f and 2g but this time with a positive view based on the NPPF guidelines.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

SS

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Strategic Policy SS: Spatial Strategy

2.2 We are supportive of the introduction of the new Spatial Strategy policy in the Regulation 19 Local Plan Consultation. In particular we are fully supportive of the identification of Haslingden at the top of the settlement hierarchy as a Key Service Centre, as Haslingden is demonstrably a highly sustainable settlement which can sustainably accommodate higher levels of growth in the future.

2.3 Haslingden benefits from a number of local facilities and public transport routes, including the X41 red express bus route which provides direct access in to Manchester City Centre at a frequency of two services per hour. Haslingden also has a designated District Centre, which is in the second tier of the retail hierarchy. As such, Haslingden is a high performing settlement in the retail hierarchy, by virtue of the numerous local shops, restaurants, public houses and other facilities which are present in the area. Haslingden also benefits from a number of health and educational facilities, which coupled with all of the above, results in Haslingden being a highly sustainable settlement.

2.4 As such, we welcome the identification of Haslingden as a Key Service Centre in Rossendale, as well as the allocations around Haslingden, including Grane Village (which is more closely related to Haslingden than Helmshore as noted above), as these are suitable sites which will support growth in a sustainable manner.

LAND WEST OF MARKET STREET, EDENFIELD

Strategic Policy SS: Spatial Strategy

2.2 We support the introduction of the new Spatial Strategy policy and particularly the confirmation that greenfield development will be required within and on the fringes of the urban boundary. There is a clear need for the development of such greenfield sites in order to meet the emerging housing and employment needs of Rossendale, due to their being insufficient brownfield capacity within urban areas.

2.3 We also support growth and investment being concentrated towards major allocated sites, including the Edenfield site, which is a highly suitable and sustainable site for allocation in the emerging Local Plan, and we explore this in more detail through this representation.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5174****Winfields Holdings Ltd and Winfields Ltd**

Number of supporters:

Commenting on

Strategic Policy SS: Spatial Strategy

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

The general approach and hierarchy set out is considered to be sound as it seeks to concentrate development on major sites and utilise well located brownfield land. The policy goes on to confirm that greenfield land is also required to meet housing and employment needs (Paragraph 2). The subsequent commentary, however, fails to provide flexibility to develop brownfield sites within smaller settlements which are well located in sustainability terms (such as Acre) or to allow for the growth of existing businesses (as sought by employment policies). Instead, policy seeks to limit development in such settlements to appropriate infilling or conversion (or where it is based on local need). The proposed wording is, therefore, considered unsound as it would prohibit the effective use of brownfield land ahead of greenfield land, contrary to the thrust of this policy and Government guidance, and other policies in the emerging plan (such as Policy HS1 which seeks to ensure that 30% of all new dwellings are provided on previously developed land, which is 10% higher than previously proposed). It could also constrain the expansion of existing businesses in an appropriate manner. As such, the policy should be revised, as described overleaf.

The policy should either differentiate between brownfield and greenfield land earlier within the text, or specifically refer to a positive approach to the redevelopment of brownfield land that is sustainably located, with preference being given to brownfield land first. The development indicated as being acceptable within 'other places' (bullet (e)) should support not only, inter alia, proposals to meet local need but also those which support existing businesses. Reference to larger scale redevelopment schemes being based upon 'exceptional' reasons is also considered potentially prohibitive to the reasonable aspirations of existing businesses or the redevelopment of a brownfield site ahead of greenfield land. It is suggested that this part of the policy should be reworded to refer to 'appropriate' reasons for larger scale redevelopment schemes, which would allow a more considered approach addressing different strands of policy.

Do you wish to participate to the Examination In Public? **No**

Reasons

Number of comments in this section 6

Chapter 1: Housing

Comments on policy Housing Housing

Reference **17 Mrs N Longmire** - Number of supporters:

Commenting on - Travellers site and houses to be built bacup

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Soundness of plan : the travellers site is to be built on contaminated land, the cost to the tax payer clear and build the site will be a vast . The land of as supposed to be used as business as the Covent on the land states . More cost to the taxpayer as money could be clawed back . Badger setts on the land will be disturbed for have to be removed illegally at more cost to the taxpayer. The councillors did not have all the information to discuss properly at meeting to vote for the site . No up to date contamination reports . No coatings of building site and clearing land. How much of a burden will it become to the local taxpayers. Site is at the entrance to Lee mill quarry which is a tourist attraction for bikers, hikers a lot of money already spent on the attraction but more invest is needed. The travellers site could contribute to loss of further investment of quarry and regeneration to the business land as no business would want to invest in the area.As regards the 689 houses to be built in Bacup 23% of all house allocation in rossendale to be in Bacup. Area is very deprived no jobs. Not got adequate infrastructure. Only one doctors surgery and dentist in area. Over subscribed schools. Limited public services buses etc. One main road in and out of the area. Duty to co operate Travellers site : no local residents views were taken into account until already in consultation. Not a lot of evidence to prove they have worked / co operated with other local areas to consult to use their sites that are not fully used .

Remove the transit site from futures park Bacup . Clear the contaminated land and regeneration of area invest in jobs and community for visitors attraction to quarry. Allow the plans for the trail head centre to go ahead. Consult better with surrounding areas councils to use / share all ready built travellers sites.Reduce the amount of houses to be built in Bacup and instead build new doctors /schools/ and increase other public services. Invest and regeneration of the whole Bacup area including roads.

Do you wish to participate to the Examination In Public? **Yes** Reasons In order the inspector fully understands the area and it's needs and the way the whole process has been carried out by the council and local councillors.

Reference	26 Mr	John	kardasz	-	Number of supporters:
Commenting on	-		Housing Strategy		
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate? Yes
<p>I fully support the Local Plan as I believe it is both legally complaint and sound. This is based on my personal opinion that the LP is compatible with key policies that support the housing needs requirements (SPHS1) and the land identified for future development (SPHS2). I have submitted my land for consideration; East of 6 Hargreaves Fold Lane Chapel Bridge (H64) and it is now included in the LP. The plan offers a greater opportunity to improve the local areas and provide local housing for local people of all ages.The LP appears to offer a sound approach to achieving Rossendale Council's Local Plan intentions.I have no concerns in respect to the proposals and fully support the LP and look forward to future progression to achieve sustainable communities.</p>					
NONE					

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	66 Mrs	Alyson	Mousley	-	Number of supporters:
Commenting on	-		-		
Is the Local Plan legally compliant?	Did not answer		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>The plan fails to consider the large number of old people who don't want 'assisted' living but do want bungalow house living. There is a huge lack of bungalow stock. Low level land close to facilities should be identified and ring fenced for bungalow properties with a minimum of 2 bedrooms. This will help release larger properties for families.Properties suitable for shared living eg 2 people living together as 'friends' in order to share mortgages etc. Housing stock with two or more equal sized bedrooms are needed. This will allow mid 20s the chance to move out of the parental home possibly allowing parents to downsize thus giving housing stock availability to families.There is a lack of understanding as to public transportation around the valley, recent problems with school buses and overcrowding on some services need to be addressed before more people further overcrowd the service. There is also a duty of safe journey for school children.Given Rossendale has been highlighted as the worst for traffic congestion in the country outside the big cities RBC will push the valley to breaking point if more houses are built without first resolving road links - improved public transport including the rail link to Bury/Manchester need to be built first.How have people who are registered blind able to access this information?</p>					

In order for this plan to involve a proper consultation with local people it needs to be in plain language. There are to many documents to determine illegalities for the average resident. I have not been able to find details of exsisting properties being used to fulfil the number of properties needed.It needs to be modified to include current empty houses - compulsory purchase after 12 months unless a payment of 10% of is value is paid to RBC.Modified to included business premise being converted to residential property. The use of any green belt land is morally illegal even if RBC have found a loophole. This should not include existing properties eg barns being brought back into use as residential properties.The plan should be modified to prevent family housing being built by schools that are already full at reception class level.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons -

Reference **116 Mr John Simpson** **Helmshore Local History Society** Number of supporters:

Commenting on - Housing

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

Insufficient consideration given to the conversion of former commerical property in town centres.

Promote the conversion of more former commercial property in or near town centres into apartments, which would be affordable and suitable for single people as well as improving the appearance of town centres and bringing more life to them. It may also have the result of reducing the need to build on as much Green Belt as is proposed. A good example of such a conversion can be seen at 176 -180, Blackburn Road, Haslingden. (Former antique shop to three houses).

Horncliffe House could be included in these sites (although not in a town centre). It could be converted to flats, is in easy reach of the motorway network etc.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5119 Mr Richard Lester**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

B5. Policies in conflict

B5.1 Objection is made to Policies HS2 and HS7 as they conflict with each other, thereby rendering the LP unsound. Table 1: Housing Site Allocations in Policy HS2 in both the LP and Errata document dated 3 September 2018 proposes 400 dwellings at a density of 26 per hectare on H72 Land west of Market Street, Edenfield (15.25 hectares). This appears to conflict with Policy HS7.

B5.2 Policy HS7: Housing Density provides:

The density of the development should be in keeping with local areas and have no detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of an area.

High densities shall be provided within sustainable locations particularly on sites within defined town centres and locations within 300m of bus stops on key transport corridors. This immediately raises the question of what is a sustainable location and what are the key transport corridors. Presumably the land reference H72 is considered by the Council to be a sustainable location, as otherwise they would not propose it for development. The LP does not list or define key transport corridors but the term would seem apt to include B6527 Market Street, Edenfield. The Explanation of Policy HS7 includes:

Densities in excess of 40 dwellings per hectare will be expected to be delivered in town centres within Rossendale. Other sustainable locations where higher densities will be expected include sites within the urban boundary and within 300 metres walk to bus stops on key corridors such as the X43 and 464 bus routes. High quality design can ensure that high density proposals are good quality schemes.

It is recognised that housing densities will be lower in other areas of the Borough because of physical constraints and on site issues, for example, topography, areas at risk of flooding and landscape.

B5.3 Market Street has bus stops within 300 metres walk of land reference H72, which would be within the Urban Boundary according to Policy SD2. Application of the second sentence of Policy HS7, which is couched in mandatory terms, would therefore lead to a development of (40 x 15.25 =) 610 houses or more, not merely 400 as envisaged in Policy HS2.

B5.4 Containing contradictory Policies, the LP must be judged unsound.

Do you wish to participate to the Examination In Public? **Yes**

Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

HS12 to HS20

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS12 to HS20

9.22 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **46 Ms Karen Farquhar** - Number of supporters:

Commenting on - HS2 / HS3 / H71 / H72 / Edenfield HS2 / HS3 / H71 / H72 Edenfield

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

The proposed high level of development in Edenfield is unsound for the following reasons:
Lack of adequate transport infrastructure and failure to suggest improvements to cope with increases: Within Edenfield: Transport provision through the village has been defined as adequate to cope with the increased demand but this is simply untrue. The recent overnight works on the A56 resulted in diversions through the village. This caused bottlenecks and traffic build-ups throughout the night with at least one night's worth of hours of delays for travellers. Additionally the narrow width of the main road, unable to cope now with the parking needs of current residents, has resulted in many cars on Market Street being damaged (particularly through the loss of wing mirrors). In one incident a mother had to quickly move out of potential harm's way with her child when a car was travelling too close to her parked vehicle. Market Street simply cannot cope with the proposed increase in traffic the new dwellings would bring. Bus transportation is adequate but again subject to delays getting through the village now. Furthermore the overall state of the main road in Edenfield itself is inadequate with poor road resurfacing recently and many potholes and exposed steelworks causing damage to vehicles.
Beyond Edenfield: Access to the A56 / M66 via the two main junctions / roundabouts in the area is incomplete and not proposed to be remedied in the first stage of the proposed development. Unless this is the first action of the master plan (which is unlikely to find support quickly - see p13 of the Infrastructure Delivery Plan for notes on Highways England's likely lack of prioritisation of this option and the note on geotechnical issues), traffic will become more congested (see Infrastructure Delivery Plan p11 on projections for traffic performance to continue to deteriorate throughout the lifetime of the planned works), car damage will increase (as will recovery costs on residents), and risks to pedestrians and other road users will also increase in concert. Many residents of Edenfield work North of the village; the Operational Assessments Technical Note is clear this plan will add to the problems on the Grane Road in particular. Further consideration of where new dwellings are situated is therefore essential to prevent traffic contagion impacting the region in this manner.
Lack of adequate educational facilities and failure to suggest viable improvement options: The proposal notes a need for a second school in Edenfield or an extension to the existing primary school should the number of dwellings increase by that proposed. Any extension to Edenfield Primary risks building on land designated to remain Green belt in contradiction to this master plan and detrimental to the village as a whole, regardless of the statement that land would be allocated out of the HS2 site. A new school would be a free school (see Infrastructure Delivery Plan p8). Free schools are subject to high level scrutiny as to their success and value, having been noted as increasing segregation and division within communities as well as wasting millions in start-up costs, sometimes without the schools being opened at all. This is not a route to pursue when budgets are limited.
Failure to fully assess flood risk: Three times in the last ten years there has been surface level flooding in the fields which form the northern part of the Land West of Burnley Road site in HS2 reflecting the increase in rain seen nation-wide as the climate changes. This is not mentioned in the assessments adequately, nor suggestions to deal with the impact of these floods put forward. This flooding will impact the proposed dwelling sites in particular.
Detrimental Impact on Existing Housing and the Environment: The previous assessment on the land west of Burnley road noted that it was not desirable to build on this site because it would be detrimental to current housing and could not be justified because of the environmental impact and impact on quality of life. Furthermore the site was noted as being classified as Ancient and Post Medieval Settlement, with the ongoing pattern of settlement following a tight, ribbon, pattern for many hundreds of years, allowing residents to fully appreciate their local area and therefore "not suitable for development on landscape grounds". The previous assessments of the land near Blackburn and Burnley Roads have stated the major adverse impact on visual and residential receptors. Nothing has changed in the area since those assessments were published so the original assessments should stand for the northern sites (Blackburn / Burnley Road) of the HS2 proposal.
Overall Impact on the Village: This level of housing increase concentrated on one small village is not within the spirit of a community plan. Whilst housing is needed, completely changing the character of a village so it becomes a town cannot be the best route to achieve this. Adopting this plan will decimate the character of Edenfield; the very charm which makes it a nice, desirable, village to live in.

The plan would be sound if a fairer distribution of housing sites throughout the region was allocated instead of severely impacting upon one small village in this manner. Greater use of brownfield sites rather than allocating essential Greenfield sites needed for nature should be the standard for the plan. A clearer transport and infrastructure

improvement plan for the A56 / Grane Road / M66 roads and junctions has to be developed. The current suggestions are inadequate and will add to the projected deterioration of traffic in the area over the lifetime of the plan.

Do you wish to participate to the Examination In Public? No Reasons -

Number of comments in this section 7

Comments on policy HS01 Meeting Rossendale's Housing Requirement

Reference 18 Mr Kenneth Howieson - Number of supporters:

Commenting on Land opposite 1019 Burnley Road, Loveclough

Is the Local Plan legally compliant? Did not answer Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer

HS1 HOUSING

3.7 This Policy sets out the need to provide at least 4,000 additional dwellings over the plan period (2019-2034), equating to 265 dwellings per annum. The policy seeks to address prior under-provision in the first five years of the plan period, by increasing the annual requirement to 350 in the first five years. This strategy is supported.

3.8 It is however noted that the SHMA sets out a range of need from 265-335 dwellings per annum, it is therefore questionable as to why the Council has simply chosen the lower end of this range, rather than opting for an aspirational target to ensure need is met and sustainable growth achieved.

Do you wish to participate to the Examination In Public? Did not answer Reasons

Reference	79 Mr P	Ramsden	Linden Park Developments Ltd	Number of supporters:
Commenting on	-	Policy HS1		
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Yes
<p>The net housing requirement for the period 2019-2034 will be achieved through the development of a number of sites proposed in the draft plan as allocations for housing development. This policy confirms that the new plan provides for at least 4,000 additional dwellings over the plan period, equating to 265 dwellings a year, which addresses prior under-provision of 425 dwellings (as of 31st March 2017) within the first five years of the plan period; delivering an overall amount of 20% of all new dwellings on previously developed land (PDL) across the Borough; and keeping under review housing delivery performance on a yearly basis. The Representor questions whether, based on previous poor delivery rates, 4,000 additional dwellings is an adequate requirement/target. In addition, while the Representor agrees with the presumption that the plan should aim to try to play catch-up on the issue of under delivery in previous years, it questions whether 425 dwellings within the first five years of the plan period is an achievable target given previous poor performance on delivery, which in part is due to the lack of suitable, available and viable development sites. A further point of concern is the fact that the target for brownfield development, which is 20%, seems very low when the nature and profile of the borough is considered. We would have expected the target to be greater. Indeed, the figures for neighbouring authorities in previous years have been considerably higher. If the target is correct, based on a full review of available opportunities, it suggests that what greenfield sites are proposed to be allocated should be suitable, available and viable for development and, ideally, deliverable in the short term, given the point made earlier about the need to play catch-up.</p> <p>The Representor proposes a change of designation of their site off Lindon Park Road from Green Belt to Housing, which could reduce the pressure on urban areas and their infrastructure and reduce the overall amount of greenfield land which must be allocated for development. Such a change in allocation would be suitable given the extant planning permission for housing which exists on the site and would be particularly useful in meeting housing targets, given the borough's history of poor delivery rates due to lack of suitable, viable and available development sites.</p>				
Do you wish to participate to the Examination In Public?	Yes	Reasons	In order to purvey the above representation in a professional manner, resulting in the best possible outcome for our client.	

Reference **94 Mrs L Bower** - Number of supporters:

Commenting on - HS1

Is the Local Plan legally compliant? **No**

Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **No**

2.0 Objection to Policy HS1 – The Requirement 2.1 Strategic Policy HS1: Meeting Rossendale’s Housing Requirement states: “The net housing requirement for the period 2019-2034 will be achieved through: a) Providing at least 3,180 additional dwellings over the plan period equating to 212 dwellings a year b) Delivering an overall amount of 30% of all new dwellings on previously developed land (PDL) across the Borough c) Keeping under review housing delivery performance on a yearly basis The housing requirement figure for Edenfield Community Neighbourhood Forum for 2019- 2034 is 456 dwellings.” 2.2 The justification in the plan for the use of the 212 figure is as follows (unnumbered paragraphs). “The need for new housing in Rossendale has been assessed in the Council’s Strategic Housing Market Area Assessment (SHMA) (2016). This study examined a range of housing, economic and demographic evidence to assess housing need and demand in Rossendale. The SHMA recommends that the need for additional housing in Rossendale is between 265 and 335 dwellings per year. The Council considers that a figure of at least 265 additional dwellings per year would be sufficient to meet Rossendale’s housing needs over the plan period. This equates to a total number of dwellings to be provided over the plan period (2019-2034) of 3,975. Since the SHMA was produced the Government has announced its intention to implement a standard methodology for calculating housing figures. Using this approach the relevant annual housing provision for Rossendale is set at 212 homes per year. This figure is applicable for ten years but the Council has extrapolated this over the Plan period, giving a total housing figure of 3,180 dwellings. The Council is not pursuing a higher figure based on “economic uplift”. 2.3 In summary, the Council has ignored its evidence base and chosen to proceed on the basis of the draft methodology published by the Government in 2017. This raises a number of fundamental points which go to the soundness of Policy HS1 and why the plan cannot proceed to Examination. 2.4 The first is that the Council has prematurely sought to depart from its SHMA and apply the standard methodology. This is because the standard methodology was not finalised when the plan was approved for consultation (11th July 2018) as the revised NPPF (Framework) was published on 24th July 2018 and the updates to the Planning Practice Guidance thereafter. 2.5 The second is that it has not taken into account the 2016 based household projections published in September 2018 and further changes to the methodology are expected. 2.6 The third is that no additional allowance has been made for any economic uplift or the findings of the SHMA. 2.7 We now assess the above points in greater detail. National Policy Context 2.8 Paragraph 60 of the NPPF states: “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” 2.9 Further guidance is then set out in the PPG which states: “What is the standard method for assessing local housing need? The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement. (our emphasis) Paragraph: 002 Reference ID: 2a-002-20180913 Revision date: 13 09 2018” (our emphasis) 2.10 The above extract is important as the PPG is clear that the standard method is a minimum figure but importantly it does not produce a housing requirement. The plan as drafted has in essence equated the standard method to the housing requirement. That is wrong and one reason for this misapplication of guidance was that the plan has been prepared prior to the publication of the Framework and PPG. We have emphasised the revision dates in the quotes above and below. 2.11 The starting point for the standard methodology is the household projections. The PPG provides clarification on the status of the household projections. It states: “Why are household projections used as the baseline for the standard method? Using household projections as the baseline ensures that the process begins with a clear and transparent assessment of anticipated household growth for every area. The Office for National Statistics’ projections for numbers of households in each local authority are the most robust estimates of future household growth. The household projections are trend-based, meaning that they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not predict future growth. Paragraph: 005 Reference ID: 2a-005-20180913 Revision date: 13 09 2018” (our emphasis) 2.12 As noted in the quote above, the household projections are trend based so by their simple application the Council is

seeking to continue historic under provision of housing in Rossendale. The results of the SHMA, which is a greater annual need, is based on a more detailed local assessment of need and should be considered once the standard methodology is applied. 2.13 The PPG then advises local planning authorities to calculate their housing need figure at the start of the process. It states: "When should strategic policy-making authorities assess their housing need figure for policy-making purposes? Strategic plan-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate. The housing need figure generated using the standard method may change when National Household projections and affordability ratios are updated by the Office of National Statistics and this should be taken into consideration by strategic policy-making authorities. Paragraph: 008 Reference ID: 2a-008-20180913 Revision date: 13 09 2018" (our emphasis) 2.14 In the case of this plan that has not been the case and could not have been the case as the methodology was published after the current consultation commenced. Indeed the Regulation 18 consultation applied the SHMA figure of 265 dwellings per annum. Therefore progressing the standard methodology requirement at this stage is contrary to the PPG. Again this is a consequence of the plan being published before the PPG was issued. 2.15 In light of our point earlier regarding the status of the SHMA, the PPG advises on the weight to be given to a SHMA. This applies directly to this plan. It states: "When might a higher figure than the standard method need to be considered? The government is committed to ensuring more homes are built and are supportive of ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where actual housing need may be higher than the figure identified by the standard method. Where additional growth above historic trends is likely to or is planned to occur over the plan period, an appropriate uplift may be considered. This will be an uplift to identify housing need specifically and should be undertaken prior to and separate from considering how much of this need can be accommodated in a housing requirement figure. Circumstances where this may be appropriate include, but are not limited to: where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals); where strategic infrastructure improvements are planned that would support new homes; where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground; in addition authorities should also consider: previous delivery levels. Where previous delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need; and recent assessments of need, such as a Strategic Housing Market Assessments (SHMA). Where these assessments suggest higher levels of need than those proposed by a strategic policy-making authority, an assessment of lower need should be justified. (our emphasis) Paragraph: 010 Reference ID: 2a-010-20180913 Revision date: 13 09 2018" (our emphasis) 2.16 Therefore the findings of the SHMA must be assessed and included in the housing requirement for this Plan. A failure to do so results in an unsound and unlawful plan. 2.17 The local plan was published on 23rd August 2018. The plan was approved by Full Council on 11 July 2018, which was before the revised Framework was published on 24th July 2018. Indeed in the document titled "Housing and economic development needs assessments" which was published on 24th July 2018, the Government states: "Your attention is drawn to the following wording within the government response document to the revised National Planning Policy Framework: A number of responses to this question provided comment on the proposed local housing need method. The government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018. In the housing white paper the government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September 2018. We will consult on the specific details of any change at that time. It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020s." 2.18 Therefore the updated PPG could not be any clearer that the new methodology for assessing housing needs is incomplete and will be subject to further consultation. There can be no question of applying the standard methodology now to replace the SHMA requirement figure at this stage. 2.19 The issue of the standard methodology has been assessed in a number of appeal decisions. These are attached. 2.20 In an appeal in South Ribble dated 31st August 2018 (Appendix 1), the Inquiry was held after the publication of the revised NPPF

and the issue of paragraph 73 was considered and reported on by the Inspector. He states: “40. In arriving at the most appropriate planning balance to apply to the appeal proposal, I have considered whether the development plan policies that are most important in determining this appeal are to be considered out-of-date, for the purposes of paragraph 11 of the 2018 Framework. In terms of the evidence submitted on the 5 year housing land supply, the Council has put forward a revised housing requirement against its local housing need of 209 dwellings per annum (dpa), based on paragraph 73 of the 2018 Framework. However, I am not satisfied that it represents a true reflection of the Borough’s housing requirements. 41. Firstly, the figure suggested by the Council would be significantly lower than a ‘plan based’ housing requirement of 785 dpa which has been arrived at through the CLCS full objectively assessed need. Although the policies are more than 5 years old, this housing requirement was endorsed by the three Central Lancashire Authorities, that include the South Ribble Borough Council, in a signed Memorandum of Understanding, dated September 2017. As such, the appellant has argued that the strategic policies have been reviewed and not found to require updating, in accordance with footnote 37 to paragraph 73 of the 2018 Framework, but I am not convinced that this represents a review of the policies. 42. Secondly, the reduced figure would not reflect the Government’s objective given in paragraph 59 of the 2018 Framework to significantly boost the supply of homes. Nor would it assist in fulfilling the Council’s ‘City Deal’ obligations. 43. Thirdly, the local housing need should be used to inform strategic policies, as indicated in paragraph 60 of the 2018 Framework. Before it is used as a basis for calculating the 5 year housing land supply, it should be agreed by the two neighbouring authorities that are included in the housing management area to address the overall requirements of the area, a relevant buffer should be applied and the backlog should be addressed. This exercise has not been carried out by the Council. It is not for an Inspector on a Section 78 appeal to seek to carry out some sort of local plan process as part of determining the appeal, so as to arrive at a constrained housing requirement figure, as it is an elaborate process involving many parties who are not present at or involved in the Section 78 appeal. 44. Finally, Government guidance indicates that the new methodology for assessing the housing needs is incomplete and so it would be premature to take and rely upon such an assessment. For these 4 reasons, I find that the housing requirement figure suggested by the Council at the Inquiry should not be used for calculating the 5 year housing land supply in this appeal. Therefore, in the absence of any realistic alternative figure, I have taken the requirement as being the CLCS led figure of 785 dpa. The Council has indicated that, on this basis, it can demonstrate a 5.01 year supply of deliverable housing sites.” 2.21 We make specific reference to paragraphs 42 and 44 which are clear that the standard methodology could not be used for determining that appeal. Whilst that was for decision taking, the same conclusions must also apply to plan making particularly when it is looking forward to 2034. 2.22 In an appeal dated 29th September 2017 (Appendix 2), the Inspector stated: “33. As noted earlier, on 18 September 2017, some time after the closure of the inquiry, the Council submitted further information on HLS, following the publication of the Government’s consultation proposals entitled “Planning for the right homes in the right places”. In its note, the Council points out that on the basis of the proposed, standard method for calculating local authorities’ housing need, the indicative figure for County Durham would be 1,368 dwellings per annum (dpa). This would be below all of the values for OAHN put forward by the Council in its 2016 Issues and Options consultation document prepared for the emerging CDP, as detailed below.” 38. I have given full consideration to the points put forward by the Council, and have noted the support given to the Council’s position by the DLGAGAB. However, the fact remains that the Council’s revised figures relate only to a consultation process, which is still on-going, and can therefore carry little formal weight at this time. There is no certainty that the standard methodology suggested in the consultation document will be formally adopted, in due course – with or without amendment, and the indicative figures put forward by the Council as a result of this consultation have not been tested in any meaningful way.” 2.23 Again the Inspector in that case could not be clearer and therefore for this plan the draft standard methodology cannot be used for plan making and is both unlawful and unsound. 2.24 There is a clear tension between the outcome of the SHMA and the requirement in Policy HS1. The SHMA requires at least 265 dwellings per annum, yet the Council has ignored the SHMA and is applying the draft Government standard methodology. The guidance we have referred to above is clear that a SHMA should be taken account of as the standard methodology is the starting point. The Regulation 18 consultation was based on the SHMA findings and Policy HS1 had an annual requirement of 265 dwellings. There can be no justification to now ignore it. 2.25 The 2017 SHMA summarises the findings which are set out below. “The scale of objectively assessed need is a judgement and the different scenarios and outcomes set out within this report provide alternative levels of housing growth for Rossendale. Taking into account the scenarios tested, it is Lichfields’ recommendation that the housing OAN range is between 265 and 335 dpa for Rossendale. It will provide a realistic level of housing provision which will address economic growth requirements, affordable housing need, worsening market signals and the demographic challenges that are present. The process by which this range was derived was as follows: 1 183 dpa equates to the 2014-based household projections, rising to 202 dpa with necessary adjustments being made to headship rates in the younger age categories (plus rebasing the figures to align with the latest 2015

MYE). In Rossendale a level below this would be unlikely to meet the demographic needs of the existing or future population. A further upwards adjustment to 220 dpa would align with long term migration trends; 2 A worsening of some market signals suggests the need to improve affordability to stabilise the increasing house prices and affordability ratios. This would justify a modest uplift to the figures over and above the level suggested by the demographic projections. A 10% uplift to the demographic starting point would indicate a minimum demographic OAN of 242 dpa; 3 269 dpa represents the level of housing growth necessary to provide a sufficiently large labour force to support the latest Experian job growth forecasts for the Borough, assuming that commuting rates remain constant and partial catch up headship rates are applied. This figure would rise to 335 dpa if the Council's Core Strategy growth needs are to be realised in full (again incorporating partial catch up headship rates); 4 The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies even higher estimates of total need, although whether such estimates will ever be realistically achievable is open to question. Nevertheless in light of the high level of affordable housing need identified, it is considered that this supports a further additional uplift of 10% to the range, above the level identified by demographic needs alone or a minimum OAN of 266 dpa (or 265 dpa rounded)."

2.26 There are a number of key factors assessed in the SHMA which have not been carried forward into the plan. Of most importance is the refusal of this plan to apply an economic uplift. The SHMA is clear that "269 dpa represents the level of housing growth necessary to provide a sufficiently large labour force to support the latest Experian job growth forecasts for the Borough".

2.27 The Employment Land Review which was undertaken in 2017 and by the same authors as the SHMA sets out the recommendations for the plan. Paragraphs 9.88 to 9.98 set out the conclusions. The overall recommendation is a range of employment land between 22 hectares and 32 hectares between 2014 and 2034. Policy EMP1 (Provision for Employment) sets a requirement of 27 hectares.

2.28 The Council has chosen the midpoint in the range which they state is based on a housing need of 220 per annum. However Table 9.10 of the Employment Land Review assumes that for the period 2014 to 2034 4,410 dwellings would be built. However Policy HS1 only seeks to deliver 3,180 dwellings between 2019 and 2034. This is 1,230 dwellings short of the number of dwellings required by the Employment Land Review. Even with completions between 2014 and 2019 there is still a significant shortfall and therefore a mismatch between the evidence base and the plan. An economic uplift is required.

2.29 This failure has also consequences for the Sustainability Assessment which has not considered the reasonable alternatives through ignoring the SHMA and any economic uplift.

Conclusion – HS12.30 For the above reasons Policy HS1 is not sound as it is not consistent with national policy, justified, positively prepared or effective because:

- The 212 dwellings can only be the starting point. It is not a housing requirement;
- It is based on the draft standard methodology and the plan was prepared before the NPPF and PPG was published;
- It does not taken account of the 2016 based projections which themselves are subject to further change;
- It has given no weight to the findings of a recent SHMA contrary to the plan's own evidence base and the PPG; and,
- It has given no weight to any economic uplift contrary to its own evidence base and the PPG.

2.31 As a minimum the requirement in Policy HS1 should revert to 265 dwellings per annum. However our overall conclusion is the plan cannot proceed to Examination.

As a minimum the requirement in Policy HS1 should revert to 265 dwellings per annum. However our overall conclusion is the plan cannot proceed to Examination.

Do you wish to participate to the Examination In Public? Yes

Reasons Our objections raise significant issues with the plan, the housing requirement and the omission of our client's site as an allocation.

Reference	101 c/o Agent	c/o Agent	c/o/ Agent	The Methodist Church	Number of supporters:
Commenting on	-		HS1		
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate? Yes
Please see attached Statement prepared by Nexus Planning					

4.0 Policy HS1: Meeting Rossendale's Housing Requirement

4.1 Policy HS1 establishes a net housing requirement of at least 3,180 dwellings, or 212 dwellings per annum (dpa). This is based on the Government's standard method for calculating housing need, consulted on in 2017.

4.2 The revised National Planning Practice Guidance (ID: 2a-002-2080913) makes clear that the standard method figure should be viewed as a minimum housing needs figure. It does not produce a housing requirement. Furthermore, the Government is currently (at time of writing) reviewing the standard methodology in light of the publication of the 2016-based Household Projections and so its application as a tool for assessing housing requirements, and whether it will persist in its current form, is still unknown. It is therefore entirely possible that the overall housing requirement will be higher than the 212 dpa which is now being consulted on and that this figure should be treated as an absolute minimum at this stage.

4.3 We support the inclusion within Policy HS1 that the Housing Requirement figure for Edenfield is 456 dwellings. This is consistent with national policy which requires strategic policies to 'set out a housing requirement for designated neighbourhood areas which reflect the overall strategy for the pattern and scale of development and any relevant allocations' (paragraph 65, NPPF) and provides clarity for all relevant stakeholders.

Please see attached Statement prepared by Nexus Planning

Do you wish to participate to the Examination In Public?	Yes	Reasons	As landowners of part of 'Major Site' H72: Land West of Market Street, the Methodist Church consider it is important to have the opportunity to participate in the examination in support of the allocation of the site.
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Reference	103 Mrs Elizabeth Gillan	Gillan	-	Number of supporters:
Commenting on	-		Housing need and justification	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Did not answer
The household projection figures have been updated since publication of the local plan resulting in a reduction of the total number of new households over the plan period. The target used is 3,180 whereas under the latest ONS 2016 projections the revised figure should be 2,692 (including market signal adjustment) over the plan period. This reduces the total requirement and need for housing, and therefore the need to allocate the extent of land allocated for housing in the local plan. Particularly areas outside of the urban boundary and the countryside. On this basis I would consider that the plan is unsound.				

Revision of the housing need assessment is required and reconsideration of the allocation of housing land in relation to sites outside the urban boundary and the countryside. The current assessment is based on outdated household projection figures.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

HS1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

A. RCT object to HS1's focus on "aspirational" housing, despite explanations: Strategic Housing Market Area Assessment (SHMA) (2016).....based on the projected increase in the number of households over the plan period, uplifted to take account of worsening market signals and the need to provide affordable housing.....particularly highlights a need for larger, aspirational property types in Rossendale to rebalance the stock away from small terraced properties and reduce the high levels of outmigration to adjoining areas. It also evidences the need for more good quality, specialist accommodation designed specifically for the growing elderly population.

B. RCT compared the build rate in 2017 of 265/year, with the 172/year delivered from 2011 – 2016, the present Core Strategy 247/year and the Inspectors 222/year:-
Report to Rossendale Borough Council by Roland Punshon BSc Hons, MRTPI

29. The Council's proposed annual rate of housing delivery would be in general conformity with the RS. Whilst I am satisfied that house building rates of more than 222 dwellings per annum could be achieved, I have seen no evidence to persuade me that substantially higher annual rates could be consistently maintained. In addition, given the character of the local environment with its narrow, developed valleys and open uplands, I am concerned that a substantial increase in requirement to meet the need/demand levels identified by the Council's SHMA could be difficult to achieve without causing unacceptable harm to the character and appearance of the area.....A robust Monitoring and Implementation Strategy will assist in this regard (see Issue 10 below). In these circumstances I am satisfied that, in the light of the existing evidence, the adoption of a housing requirement of 222 dwellings per annum is appropriate although the level of the overall housing requirement will need to be kept under regular review and the DPD should be adapted as appropriate.

C. RCT note adoption now of 212/year 2016-2026 in 14 September 2017 Department for Communities and Local Government Planning for the right homes in the right places: consultation proposals, and explained:-

Indicative assessment of housing need based on proposed formula, 2016 to 2026. This is calculated based on the formula proposed in the consultation document Planning for the right homes in the right places. It uses affordability ratios for 2016, and average household growth over the period 2016 to 2026 from the 2014 based household projections. The Local Plan figures used to calculate the proposed cap are included in column I. The assessment is indicative, as actual figures will depend on the most recent data available at the time the need is calculated. For the purposes of the calculation, plans adopted within five years of the date of publication have been considered up to date.

Current local assessment of housing need, This has been collected by DCLG from publically available reports. Where possible we have used the latest available figure on the Local Authority's website, with sources for these provided in column G. This is to provide a point of comparison for the formula based assessment of need. Whilst every opportunity has been taken to ensure the latest figures have been taken, these figures should be treated with caution as not every local authority has been able to provide confirmation prior to publication.

Proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest Calculated from publically available data from DCLG, Natural England and the ONS. This provides an indication of land that is not generally available for development, to illustrate the point in the consultation document that not all authorities will be able to meet their need in full within their own area.

RCT note Rossendale ONS Code - E07000125, to then compare with its neighbours:-

Indicative assessment of housing need based on proposed formula, 2016 to 2026

(dwellings per annum) – 212. Bury - 597. *Hyndburn – 60.

Current local assessment of housing need, based on most recent publically available document

(dwellings per annum)- 265. Bury – 610. *Hyndburn - 180 - 350

Proportion of Local Authority land area covered by
Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest - 31%. Bury - 60%. *Hyndburn - 58%

D. RCT 18/9/17 question to DfCLG: 14 September consultation on housing numbers, that proposes 212/year 2016-2026, and notes present revised local plan consultation of 265/year, and current 2011 – 2016 Local Plan Core Strategy of 247/year, which was based on Planning Inspector's 222/year and a previous shortfall. Now on a first scan through/word find look at this consultation, as it makes no mention of individual LA's past 2011-2016 Table 100 deliveries – Rossendale 172/year, am thinking that it's based on where we are now nationally, and so past shortfalls on local plans are not a issue;

21/9/19 HOUSSTATS: You are correct that the method does not account for past shortfalls (except where these impact affordability).

So we are now looking at a reduction from the present Core Strategy 3700 growth to 2026, on basis of 860 for 2011-16 plus 10 x 212, to 2980 dwellings. and to 2034???

And now outcome of latest ONS projections' Table 329b shows for Rossendale 30000 households in 2014, 33000 households in 2039. Is that 3000 dwellings, at 120/year???

RCT also see for Rossendale a potential problem: in areas close to neighbours with high demand: Bury and Rochdale, and those with low demand: Hyndburn and Burnley.

E. RCT see as still relevant comments on abandoned 2015 Local Plan's Housing Needs

The 1951 Census shows Rossendale with a population of 68958 living in 22550 dwellings. The 1971 Census shows 61857 in 22460 dwellings. In 2001 the Census shows c65600, and the Council Tax Dwelling Stock Total was 28960. By 2009 LCC estimate population at 67100, and 2009 Council Tax Dwelling Stock Total is 30544.

We see an occupancy reducing from c3/dwelling, c2.75/dwelling, c2.3/dwelling, to an estimated c2.2/dwelling. Will the 2011 Census help to show where Rossendale's housing stock is becoming so under occupied? With the retirement of the "baby-boom" generation will this under occupation increase?

To counter the Local Plan's aim for 3 and 4 bed "aspirational" needs. Is there an unmet demand for new 2 bedroom 3 person and 3 bedroom 4 person houses, with their wheelchair accessible ground floors as required by current Building Regulations: to facilitate policies for more care in the home?

What's the engines driving growth in Executive, Low Cost Market, Affordable and Registered Social Landlord Housing. The RSS's target was 222 dwellings / year from 2003 - 2021, it had a shortfall of c370 due to a market slump, and so we see the :Local Plan11/26's 15 years target is now 3700: (222 x 15 + 370). But is this really just a paper target of convenience, that does not take account of the practicalities: that most of Rossendale's potential housing sites are not large, and further many have access problems of steep roads, that will need significant investment to enable there satisfactory use. And what's real aims? Planned urban villages at 50/Ha or, as appears so frequently in Stage 2, "low density" 25/Ha suburban estates?

Compare with other Core Strategies for the period 2011 – 2026:-

Warrington, CS estimated 2010 at 198,900, 9099 dwellings = 0.046d/p now 202,228.

Blackburn + Darwen, CS at 141,200, 9365 dwellings = 0.066d/p.

Rossendale, CS at 67,300, 3700 dwellings = 0.055d/p.

Given Warrington's strategic location on M6, M62, M56, West Coast Main Line, Liverpool to Manchester Line, future HS2, Manchester Ship Canal, and between Liverpool and Manchester Airports, and no hilly terrain, why should the more remote Pennine Lancashire be aiming for so much more new housing? Are we seeing the same sort of wishful aims that produced that oversized bus station in Preston?

Do you wish to participate to the Examination In Public? Did not answer Reasons

Reference **5148****Edenfield Community Neighbourhood Forum**

Number of supporters:

1213

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy HS1: Meeting Rossendale's Housing Requirement

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy

49. Strategic Policy HS1 outlines that at least 3,180 additional dwellings would be required over the plan period (2019-2034) – equating to 212 dwellings a year. The housing requirement for Edenfield Community Neighbourhood Forum over this plan period would be 45619. This equates to 14.3% of the borough's housing requirement over this plan period.

50. For context, the Regulation 18 Draft Local Plan stated that dwellings required over the Plan Period would be 4,000. Therefore, this is a reduction of 820 over the plan period (20.5% decrease).

51. The 2017 mid-year population estimates for Rossendale Borough, according to Lancashire County Council via the Office for National Statistics, is 70,36521. The Edenfield Community Neighbourhood Forum note on their website that Edenfield has approximately 2,300 inhabitants residing within approximately 970 dwellings in Edenfield.

52. The population of Edenfield is approximately 3% of the total for the Rossendale Borough. The inclusion of 456 dwellings within Edenfield would increase the number of dwellings by approximately 47%. As noted in our representations, Edenfield was identified as a 'Level 3' settlement therefore, any proposed housing need for Edenfield should reflect its settlement hierarchy within the Borough.

53. Paragraph 78 of the NPPF 2018 states that in order to promote sustainable development in rural areas, housing should be located where it will "enhance or maintain the vitality of rural communities". It is considered that a 47% increase in the settlement to approximately 1,450 homes would cause a detrimental impact on the rural nature and character of the settlement (particularly along Market Street), which is a linear row of dwellings with key views of valley to both the east and west. The settlement is surrounded by Green Belt and low in the settlement hierarchy, therefore cannot be considered an urban area of comparable scale to Rawtenstall, Haslingden and Bacup. Therefore, it is considered that HS1 would not be consistent with national policy.

54. The Explanation for Strategic Policy HS1 provided in the Local Plan states that the need for new housing in Rossendale has been assessed through the Council's Strategic Housing Market Assessment (SHMA). However, no justification has been provided as to why the Council has given the Edenfield Community Neighbourhood Forum a housing target of 456 dwellings over the plan period.

55. Further to the above points, the Council has given ECNF a housing target and proposed allocations as to where the development will be located which in theory removes the ability of the Neighbourhood Plan to determine an appropriate level of housing need for its area or allocate any housing sites. The housing target for ECNF is unjustified, undeliverable and an entirely inappropriate level of housing for the village.

56. We note that while some new sites for housing were included in the Regulation 19 Pre-Submission Draft, over 1,000 dwellings were removed from consideration between Regulation 18 and Regulation 19 draft Local Plans. This equates to a removal of over 25% of sites across the whole of the Borough.

57. Rossendale Borough had 1,188 vacant homes as of 2017, according to Lancashire County Council - based on figures from the Department of Communities and Local Government and Council Tax records. We consider that Rossendale Borough Council should have considered assessing whether to include some or all of these vacant homes in calculating the OAN.

58. Policy HS1 does not provide justification of whether all brownfield land sites were considered. While discussed further in this Representation's analysis into the soundness of EMP2, the inclusion of land to be considered for employment use has not been fully justified by an upto-date Employment Land Review – therefore some of this Brownfield Land initially considered for employment should be considered for housing.

59. A comparison of the brownfield and mixed sites lists in the Regulation 18 and Regulation 19 Plans highlights that 21 prospective sites with the capability of delivering 656 homes were reclassified for various reasons.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5157 Ms Joanne Harding Home Builders Federation** Number of supporters:

Commenting on HS1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

ROSSENDALE LOCAL PLAN: PUBLICATION VERSION (REGULATION 19)

Thank you for consulting with the Home Builders Federation on the Publication version of the Local Plan for Rossendale (Regulation 19).

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.

Strategic Policy HS1: Meeting Rossendale's Housing Requirement

Policy HS1 is not considered to be sound as it is not positively prepared for the following reasons:

This policy states that the net housing requirement for the period 2019-2034 will be achieved through providing at least 3,180 additional dwellings over the plan period equating to 212 dwellings a year. It is noted that the 212 homes per year is based on the MHCLG standard housing methodology. This MHCLG figure is applicable for ten years but the Council has extrapolated this over the Plan period, giving a total housing figure of 3,180 dwellings.

Planning Practice Guidance (PPG) draws attention to the wording of the Government's response to the revised NPPF which states that 'the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September'. Therefore, the Council should be aware that the housing figures provided by the MHCLG standard methodology are likely to change.

The figure generated by the standard method is considered as the minimum starting point, it is noted that it relies on past growth trends, which in the case of Rossendale may have been affected by the lack of appropriate site allocations and poor housing delivery. The HBF considers that there are circumstances where an uplift will be appropriate such as where growth strategies are in place (for example the Northern Powerhouse) or where funding is in place to facilitate growth such as the Housing Infrastructure Fund. It is therefore clear that in the case of Rossendale an uplift would be considered appropriate.

It is also noted that the MHCLG standard methodology will not have taken into consideration other issues that are highlighted within the Council's own evidence for example the SHMA suggests an adjustment to the household formation rates for younger people (15-34 years), in order for the housing market to return to healthier and more sustainable conditions. This remains in line with current Government strategy, which continues to seek to increase homeownership, particularly for this age group, with schemes such as Help to Buy and changes to stamp duty to support them. It would appear remiss to remove consideration of this age group within any housing requirement set within the Local Plan. The SHMA recommends that the need for additional housing in Rossendale is between 265 and 335 dwellings per year (Table 7.1).

The HBF also have concerns that the proposed housing requirement does not represent an appropriate figure once consideration is given to the potential for economic growth and job formation. The HBF continue to consider that an appropriate balance should be sought between employment growth aspirations and the provision of homes.

The HBF proposes that the policy is modified as follows:

- Further consideration is given to the housing requirement, and the potential for it be increased to reflect some of the concerns raised.

Do you wish to participate to the Examination In Public? Yes

Reasons The HBF would like to participate at any 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.

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Paper 1:

4. Meeting Housing Needs

4.1 This chapter comments on the scale of housing delivery which is planned for by Strategic Policy HS1 (Meeting Rossendale's Housing Requirement) of the PSLP.

Context

4.2 Establishing a housing requirement is one of the key strategic purposes of a Local Plan. This is made clear in the NPPF, which states that strategic policies should set out an overall strategy for the pattern, scale and quality of development and "...make sufficient provision for..." housing including affordable homes (paragraph 20). Establishing a sound housing requirement is therefore critical to the Government's overarching objective of significantly boosting the supply of homes.

4.3 Strategic Policy HS1 of the PSLP proposes a housing requirement of 212 dwellings per annum (dpa) over the period 2019 to 2034. It is substantially lower than the 265 dpa requirement proposed in the previous draft of the Local Plan⁷ - a decrease of 20%. This is because RBC has simply sought to adopt the "indicative" minimum starting point housing need figure for Rossendale, published by Government in September 2017 alongside the consultation on its proposed "standard method" for calculating housing needs⁸.

4.4 The approach of RBC in this regard is demonstrably unsound. The NPPF sets out that the purpose of strategic policies is to address RBC's "...priorities for the development and use of land in its area..." (paragraph 17). RBC should not therefore simply and automatically be adopting the minimum starting point standard method figure as its housing requirement, even if it is politically expedient to do so. In accordance with national policy, the Council should be considering its priorities for development and growth, and ensuring that the housing requirement – and other relevant strategic policies – is sufficient to deliver those priorities.

4.5 The revised PPG – updated on 13 September, after the release of the PSLP – provides important guidance in this respect. It makes clear that the standard method is only a formula to identify the minimum housing need in an area and should be "...undertaken separately from assessing land availability, establishing a housing requirement figure, and preparing policies to address this..." (Reference ID: 2a-001-20180913). In simple terms, the standard method figure is not a housing requirement. It is quite clearly only a minimum starting point.

4.6 In some circumstances it may be appropriate for a housing requirement to align with the minimum starting point identified by the "standard method". However, in other circumstances, such as those in Rossendale, it will be appropriate and necessary for the achievement of a sustainable development that the requirement exceeds the minimum starting point. This is made clear by the PPG, which states as follows:

7 Rossendale Draft Local Plan: Regulation 18 Consultation, Rossendale Borough Council (July 2017)

8 Planning for the right homes in the right places: consultation proposals, Ministry of Housing, Communities & Local Government (September 2017)

"The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where actual housing need may be higher than the figure identified by the standard method." (Reference ID: 2a-010-20180913)

4.7 This expectation from Government that authorities plan above the minimum benchmark set by the standard method is further highlighted in its acknowledgement that the method will not in isolation deliver the 300,000 homes that it has confirmed are needed annually to address the housing crisis.

4.8 The Government has been clear to articulate its expectation that authorities plan above the 'minimum' benchmark set by the standard method

4.9 The PPG sets out particular circumstances in which an authority should consider a higher housing requirement. These include where past levels of delivery or previous assessments of need (e.g. a SHMA) have exceeded the minimum standard method figure. This is clearly the case in Rossendale:

- Its recent SHMA for Rossendale identified a need for between 265 and 335 dwellings per annum. This considered need holistically taking account of employment growth requirements, worsening market signals, affordable housing need and the demographic challenges which are present in the borough.

- Figure 4.1 illustrates that past rates of delivery have exceeded the minimum starting point “standard method” figure on a number of occasions, including twice in the last five years. The market is sufficiently strong to deliver development at this rate therefore, subject to good quality sites being made available. Relatively lower rates of delivery over the last 10 years will be attributable, as least in part, to RBC’s failure to prepare a Local Plan and make available a good quality supply of development land. Indeed the level achieved in 2013/14 represented a peak in recent years, with the Council previously welcoming this acceleration in housing provision and envisaging that such a rate of development would be sustained to ‘satisfy and take advantage of the demand that has built-up’.

Figure 4.1: Considering Minimum Need in the Context of Previous Delivery Levels

Source: Rossendale Borough Council

4.10 In direct contradiction with the NPPF / PPG, RBC has chosen to simply adopt what was the minimum starting point “standard method” figure as its requirement, without any consideration as to whether this figure is sufficient to meet actual housing need or address the Borough’s priorities. It has seemingly taken this approach on the basis that it is politically expedient to deliver as few homes as possible. The PSLP’s approach in this regard is clearly inconsistent with the policies of the NPPF and the guidance set out in the PPG. It is unjustified and has not been positively prepared.

4.11 The above factors which require consideration on the basis of the PPG indicate a greater need for housing in Rossendale than implied by the standard method, either now or when previously applied by the Council in deriving its proposed requirement. Departure from the conclusions of evidence commissioned less than two years ago has not been justified. This is despite the availability of evidence – summarised below and presented in detail at Paper 2 – which reinforces these conclusions and reaffirms the importance of planning for a more reasonable level of provision, to ensure that wider policy objectives are supported and the needs of all parts of the community are met.

4.12 The remainder of this chapter considers the extent to which the proposed requirement will be effective at meeting housing needs and addressing the Borough’s priorities. It draws upon the detailed and technical evidence which is set out in full in the accompanying Paper 2.

Supporting Rossendale’s Economy

4.13 RBC has sought to justify planning for the ‘minimum’ housing need on the basis of a perceived alignment with its proposed strategy to allocate 27 ha of employment land. It is understood that the Council has taken the view that the balance between employment and housing should be considered sound, provided it can be demonstrated that enough jobs will be provided for the new households that will live in the houses that are planned¹¹.

4.14 This justification, however, fails to take into account the Council’s own published evidence with regards the likely future labour demand to which the Plan should respond in order to create the conditions in which businesses can invest, expand and adapt. The Council’s published Employment Land Review (2017) identified that between 22 ha – 32 ha would be needed in Rossendale. The upper end of this range was directly linked to supporting forecasts of baseline employment growth and regeneration and economic policy objectives.

4.15 By contrast, the 27ha provided for within the DLP was most closely tied to a scenario which constrained the growth in new homes to 220 per annum. This evidently creates a significant degree of circularity and fails to accord with paragraph 81 of the NPPF which confirms that in setting economic planning policies plan-makers should ‘seek to address potential barriers to investment, such as... housing’.

4.16 The correct approach in accordance with the NPPF/ PPG should have been to explore how policy can support economic growth and productivity and to ‘positively seek opportunities to meet the development needs of their area’¹³.

4.17 The evidence assembled in Paper 2 confirms that it is reasonable for the Council to assume that its economy will continue to grow by at least 0.6% per annum. This recognises that:

- Its economy has seen growth of 0.8% annually over the past five years;
- Whilst baseline ‘off-the-shelf’ forecasts suggest a more muted level of growth over the plan period (0.3 – 0.4%) this is significantly influenced by these forecasts assuming a sustained and substantial decline in manufacturing jobs in Rossendale;
- The Council and the LEP have specifically established through the SEP and other supporting strategies that ‘Initiatives are underway to ensure this does not happen and that manufacturing sub-sectors with the potential to grow are fully supported’¹⁴; and

- The Council previously responded more positively to these objectives with the adopted Core Strategy targeting a 3% net increase in jobs over a fixed five-year period, equating to an average growth of approximately 0.6% per annum.

4.18 Demographic modelling commissioned to inform these representations – taking into account the recently published 2016-based sub-national population and household projections (SNPP/ SNHP) – has confirmed that 283 homes per annum would be needed to support employment growth of this scale.

4.19 This assumes a continuation of current commuting patterns. It is recognised that the Council has through the PDP expressed an ambition to “claw-back’ out-commuters’ and reduce out-commuting rates¹⁵. It is apparent that such an ambition could only have any reasonable prospect of being achieved where Rossendale’s economy demonstrably achieves stronger growth including the generation of range of different types of employment opportunities.

4.20 The modelling confirms that where each new job was created and undertaken by a resident in Rossendale, assuming a job growth rate of 0.6% per annum, in the order of 240 homes per annum would still need to be provided for. Recognising the existing relationships with other larger proximate economies, principally Greater Manchester, such a significant shift in commuting patterns would be extremely unlikely to occur. However, this provides a range of between 240 and 283 homes per annum as reasonably being expected to be required to support the borough’s expected economic growth.

4.21 The proposed requirement of 212 dpa would fall well short of supporting the economic growth potential of the borough. Indeed the analysis indicates that provision of this scale would only support in the order of 1,500 new jobs over the plan period, a level which falls below all of the other indicators considered, including recent past trends and forecasts. Such a requirement would therefore plan for a slowing of job growth in Rossendale.

4.22 The provision of only the ‘minimum’ 212 homes per annum would also have a series of other adverse consequences regarding the borough’s sustainable future. The evidence confirms it would:

- Intensify change in the borough’s age profile, by failing to counterbalance a prevalent ageing trend with growth in the working age population;
- Lead to a further worsening in affordability, by sustaining delivery at a rate that has been demonstrably insufficient to avert a continued recent deterioration in the relationship between house prices and earnings; and
- Fail to provide the supply of affordable housing evidenced as needed in the borough.

4.23 When considered in this context – as required by the PPG – there is no justification for claiming that only 212 dwellings per annum are needed in Rossendale.

A more reasonable housing requirement

4.24 The evidence presented in Paper 2 demonstrates that the Council must make provision for a minimum of 265 homes per annum in Rossendale over the emerging plan period to meet the borough’s housing needs.

4.25 This level of provision would:

- Sustain delivery at a rate that has been proven to be capable of being achieved in the Borough in an individual year, subject good quality sites, of sufficient scale being made able in viable areas, and which demonstrably facilitated the provision of much-needed affordable housing and temporarily reversed a prevalent local trend of worsening affordability;
- Support a reasonable and expected level of job growth throughout the plan period whilst also enabling a reduction in out-commuting;
- Enable a more positive contribution to be made in the delivery of affordable housing which is clearly in high need across the borough; and
- Reflect a range of provision which was recently considered to be appropriate and sustainable by the Council, having demonstrated in its own housing need evidence base and planned for in the previous consultation on the Local Plan.

Housing requirement – summary and assessment of soundness

4.26 In advancing a ‘minimum need’ for housing as its housing requirement the Council has failed to positively plan for the needs of its residents or local economy. The Council’s own recently prepared evidence confirms that the full need for housing is significantly higher than the starting point minimum need figure calculated through the standard method. This recognises that in order to support economic growth and create the conditions for businesses to invest, expand and adapt the authority will need to see a greater growth in its working age population than projected under the official household projections which form the basis for the standard method calculation.

4.27 The Council has sought to constrain the economic growth it plans to provide for in both the level of need for housing and employment land. This approach is not supported by the evidence it has published, and is not considered to represent an appropriate strategy for Rossendale. Crucially it will not deliver sufficient affordable housing to meet its needs or address worsening affordability. It is also evident that the Borough has delivered, in recent years, annual completions of new homes which have exceeded the 'minimum need'. In accordance with PPG, this is a clear indicator of a greater level of housing need than is proposed to be planned for under the housing policies of the PSLP. The proposed housing requirement is therefore unsound as it is not positively prepared or justified based on the tests established through NPPF.

4.28 The proposal to plan for the provision of just 212 homes per annum is evidently not a sustainable approach to the growth of the Borough taking account of reasonable alternatives available to the Council. The proposal is not supported by the prevailing evidence base and will exacerbate the continued under provision and under delivery of affordable housing across the Borough. It is fundamentally unsound as a result. This aspect of the PSLP is not effective, is not justified and presents a series of conflicts with NPPF, including paragraphs 59 and 60.

Paper 2: Assessment of Housing Needs

Please see appendix

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5173**

Taylor Wimpey

Number of supporters:

Commenting on

HS1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS1: Meeting Rossendale's Housing Requirement

2.12 This policy outlines that 3,180 dwellings will be required over the plan period (2019-2034), which equates to 212 dwellings per annum (dpa), and represents a decrease from the 247 dpa set out in the adopted Core Strategy which was based on the RSS, and the 265 dpa proposed in the Regulation 18 consultation, which was based on the low end of the range suggested in the 2016 SHMA.

Standard Method

2.13 Paragraph 60 of the Revised NPPF confirms that local plan submitted after 24th January 2019, as the Rossendale Plan will be (it is due to be submitted in February 2019), should use the Government's Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.

2.14 In the case of Rossendale this has led to a reduction in need, from 265 dpa in the Regulation 18 version (based on the 2016 SHMA) to 212 dpa (based on the 2014 projections), a reduction of 20%.

2.15 However, it is important to note that Paragraph 11 of the Revised NPPF confirms that for plan-making, the presumption in favour of sustainable development means that:

- Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

2.16 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. The Council then needs to consider and take account of a number of important factors including:

- Can the neighbouring authorities within (and perhaps outside) the housing market area accommodate their own housing requirements as calculated by the standard methodology? If not, the NPPF obligates the Council to determine if Rossendale could suitably accommodate them?
- Would simply achieving the standard methodology figures provide for a sufficiently flexible plan that would meet the needs of the area or should additional capacity be built into the plan? This could take a range of forms such as the identification of additional sites, back up sites, or strong and practical monitoring and review policies.
- Would the use of the standard methodology lead to a 'positive' plan being prepared and one that meets the needs of all forms of development?

2.17 For instance, if there was evidence that demonstrated that the use of the Standard Methodology would not allow the Local Planning Authority to meet forecast or planned jobs growth in the area, or would lead to unsustainable commuter or migration patterns, there would be a strong case to suggest the plan would not meet the objectives and presumption in favour of sustainable development and could therefore be rendered unsound.

2.18 In short, the Standard Methodology figures only represent one piece of evidence in relation to the preparation of a sound development plan and represents a 'minimum' figure as confirmed by paragraph 11 and paragraph 60 of the Revised NPPF. Many other considerations and evidence can and will impact on the final housing requirement figure set out in a Local Plan.

2.19 Upon first review, we note that the very recent changes to the NPPG, issued on 13th September 2018, back up our above interpretation of the NPPF in this regard. Indeed, under the Housing Needs Assessment section, the following points are raised:

- 002 – The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement;
- 003 – The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).
- 027 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

2.20 Under the question 'When might a higher figure than the standard method need to be considered?', the NPPG states the following at Paragraph: 010 Reference ID: 2a-010-20180913

"The government is committed to ensuring more homes are built and are supportive of ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where actual housing need may be higher than the figure identified by the standard method.

Where additional growth above historic trends is likely to or is planned to occur over the plan period, an appropriate uplift may be considered. This will be an uplift to identify housing need specifically and should be undertaken prior to and separate from considering how much of this need can be accommodated in a housing requirement figure.

Circumstances where this may be appropriate include, but are not limited to:

- where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals);
- where strategic infrastructure improvements are planned that would support new homes;
- where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground;

In addition authorities should also consider:

- previous delivery levels. Where previous delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need; and
- recent assessments of need, such as a Strategic Housing Market Assessments (SHMA). Where these assessments suggest higher levels of need than those proposed by a strategic policy-making authority, an assessment of lower need should be justified."

2.21 It is also noted that paragraph 60 states the standard methodology should be utilised to determine the minimum number of homes needed - 'unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and signals'.

2.22 Bearing in mind the standard methodology figure is a minimum figure, and noting the aforementioned guidance in the NPPG (as quoted above), it is clearly not logical to assume that 'exceptional circumstances' have to be demonstrated to justify the use of a higher Local Plan figure. Indeed, the Government's objectives are to boost housing supply and any authority that can sustainably deliver more homes will undoubtedly be welcomed.

2.23 The exceptional circumstances test, therefore, must apply to any authority which chooses to justify and deliver a lower housing needs requirement as its starting point for the Local Plan preparation. Notwithstanding this, we consider there are compelling reasons and some exceptional circumstances that would warrant Rossendale opting for a higher housing need requirement, which we address shortly.

2.24 Taylor Wimpey also have some fundamental concerns with the standard methodology as a whole. Notably, the standard methodology removes additional economic growth and instead pegs the housing requirement to past trends and development patterns. At its starkest, this significantly accentuates existing inequalities across certain geographies, such as the north/south divide, but it can also be witnessed, and lead to disparities, at more local levels too.

2.25 The standard methodology is also based on a top down assessment stemming from the government's national target of 300,000 homes per year, based on the 2014 projections. Notably, the 2014 projections were the latest available at the time in November 2017 and supported total growth of 266,000 dpa, so 10% short of the 300,000 figure. In short, the methodology is retro-fitted.

2.26 It is pertinent to note that the government have now acknowledged this issue. At the outset of the NPPG section entitled 'Housing Need Assessments', the following statement is made:

"The government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically, it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018.

In the housing white paper the government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September 2018. We will consult on the specific details of any change at that time.

It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid-2020s.”
2.27 Whilst we have not yet seen or reviewed how the government intends to change the methodology, it seems likely that the basic methodology and inputs will stay the same (i.e. government projections with adjustments for affordability market signals and some form of cap) and that the caps and adjustments will simply be increased to meet the higher requirement. If this is the case, it will clearly exacerbate existing trends and accentuate inequalities even further. However, we will need to see what the Government propose, and we will respond accordingly.

2.28 What is clear is that there is still some uncertainty relating the standard methodology and the approach to be used. Therefore, we do not believe Rossendale should fundamentally rely on the standard methodology until the issues set out above are addressed, and we reiterate again, that even when it is utilised it must be treated as a minimum requirement and is simply the starting point for determining the number of homes a Local Plan must provide. It does not represent a cap and its use does not automatically result in a sound plan where all development needs are met.

2.29 Based on past and anticipated employment growth within the area, we believe there are compelling and sound reasons within Rossendale that would support an uplift from the standard methodology to support economic growth and these could be regarded as representing ‘exceptional circumstances’, notwithstanding our comments above. Moreover, this Local Plan process represents an ideal opportunity to address any shortfalls or mismatch between the standard methodology approach and the government’s overall target for 300,000 homes are built per year.

Strategic Housing Market Assessment (SHMA) December 2016

2.30 The most recent SHMA was produced in December 2016 by Lichfields and suggested that Rossendale’s objectively assessed housing need (OAN) was between 265-335 dpa, and Rossendale took a requirement of 265 (the low end of this range) forward as the housing requirement within the Regulation 18 plan.

2.31 We raised concerns with this figure at the time on the basis it did not take account of economic aspirations (as specifically required by the NPPF at the time), as employment-led needs suggested a range of 269-335 dpa. We also noted how a figure at the lower end of the OAN range provided no flexibility to take account of the potential unmet needs of adjacent authorities, not least the Greater Manchester authorities, that were anticipating substantial need issues as part of the GMSF process, with the Mayor Andy Burnham also seeking to minimise Green Belt.

2.32 This assertion has been borne out, with the Green Belt Topic Paper confirming that the Greater Manchester Combined Authority have asked if Rossendale was able to meet any of their housing requirements.

2.33 As such we would continue to recommend a figure in excess of 265 dpa to take account of employment needs, and to provide some flexibility to accommodate any unmet needs from surrounding Greater Manchester authorities.

2.34 At the very least, the NPPG confirms that any figure lower than a recent SHMA (as the proposed 212 dpa figure is) must be fully justified, and it is our strong view that the Council have not done this within the plan as drafted.

Economic Growth Trends

2.35 More detailed interrogation of employment trends and assumptions that supported the SHMA provide further justification for a higher requirement and a departure from the standard methodology.

2.36 Between 2011 and 2015, total employment in Rossendale increased by 3.4% per annum, rising from 21,000 to 24,000. The majority of this growth occurred between 2014 and 2015 (circa 2,000).

This level of annual growth was significantly higher than the corresponding increases in the North West (1.2% and England (1.7%)). If you look at the most recent period of 2015-2016, employment in Rossendale fell from 24,000 to 22,000. All of these figures are taken from the Business Register and Employment Survey, published by the Office for

National Statistics. The ONS data indicate that Rossendale's labour market performed well over the period 2011-15, before contracting over the more recent 12-month period from 2015-16. It is therefore helpful to consider what future growth will look like in Rossendale, by drawing on independent forecasts produced by Experian and Oxford Economics.

2.37 The December 2016 SHMA, assesses a number of scenarios when considering future employment growth in Rossendale. These forecasts feed into calculations of future housing requirements in the District, which Lichfields conclude is in the range 269-335 dwellings per annum when the figure is employment-led. The lower figure in the range, 269 dwellings per annum, draws on baseline job forecasts produced by Experian in 2016 which are 'policy-off' – i.e. they take account of a range of macro-economic factors, including past trends. The policy-off forecasts do not consider the impact of public sector interventions such as infrastructure investment, sector growth strategies etc.

2.38 Over the period 2014-2034, the Experian forecasts estimate total job growth of 1,800 in the Borough – around 90 additional jobs annually. A separate baseline forecasting model, produced by Oxford Economics for Lancashire, indicates a similar level of annual growth over the next decade – approximately 100 new jobs each year. As an absolute minimum, Rossendale should be aiming to see jobs growth of at least 90-100 jobs per annum over the next 10-20 years. If it doesn't achieve this, the District could fall behind other parts of the sub-region. Rossendale currently accounts for around 4.0% of all jobs in Lancashire. If it does not grow at the levels forecast by Experian and Oxford Economics, it risks seeing its share of employment fall in the long-term.

2.39 Based on this, it seems reasonable to conclude that the figure of 269 dwellings per annum in the most recent SHMA should be the minimum starting point for considering annual housing requirements in Rossendale.

LAND WEST OF MARKET STREET, EDENFIELD

Policy HS1: Meeting Rossendale's Housing Requirement

2.15 This policy outlines that 3,180 dwellings will be required over the plan period (2019-2034), which equates to 212 dwellings per annum (dpa), and represents a decrease from the 247 dpa set

out in the adopted Core Strategy which was based on the RSS, and the 265 dpa proposed in the Regulation 18 consultation, which was based on the low end of the range suggested in the 2016 SHMA.

Standard Methodology

2.1 Paragraph 60 of the Revised NPPF confirms that local plans submitted after 24th January 2019, as the Rossendale Plan will be (it is due to be submitted in February 2019), should use the

Government's Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.

2.2 In the case of Rossendale this has led to a reduction in need, from 265 dpa in the Regulation 18 version (based on the 2016 SHMA) to 212 dpa (based on the 2014 projections), a reduction of 20%.

2.3 However, it is important to note that Paragraph 11 of the Revised NPPF confirms that for planmaking, the presumption in favour of sustainable development means that:

- Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

2.4 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. The Council then needs to consider and take account of a number of important factors including:

- Can the neighbouring authorities within (and perhaps outside) the housing market area accommodate their own housing requirements as calculated by the standard methodology?

If not, the NPPF obligates the Council to determine if Rossendale could suitably accommodate them?

- Would simply achieving the standard methodology figures provide for a sufficiently flexible plan that would meet the needs of the area or should additional capacity be built into the plan? This could take a range of forms such as the identification of additional sites, back up sites, or strong and practical monitoring and review policies.

- Would the use of the standard methodology lead to a 'positive' plan being prepared and one that meets the needs of all forms of development?

2.5 For instance, if there was evidence that demonstrated that the use of the Standard Methodology would not allow the Local Planning Authority to meet forecast or planned jobs growth in the area, or would lead to unsustainable commuter or migration patterns, there would be a strong case to suggest the plan would not meet the objectives and presumption in favour of sustainable development and could therefore be rendered unsound.

2.6 In short, the Standard Methodology figures only represent one piece of evidence in relation to the preparation of a sound development plan and represents a 'minimum' figure as confirmed by paragraph 11 and paragraph 60 of the Revised NPPF. Many other considerations and evidence can and will impact on the final housing requirement figure set out in a Local Plan.

2.7 Upon first review, we note that the very recent changes to the NPPG, issued on 13th September 2018, back up our above interpretation of the NPPF in this regard. Indeed, under the Housing Needs Assessment section, the following points are raised:

- 002 – The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement;
- 003 – The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).
- 027 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

2.8 Under the question 'When might a higher figure than the standard method need to be considered?', the NPPG states the following at Paragraph: 010 Reference ID: 2a-010-20180913

"The government is committed to ensuring more homes are built and are supportive of ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where actual housing need may be higher than the figure identified by the standard method.

Where additional growth above historic trends is likely to or is planned to occur over the plan period, an appropriate uplift may be considered. This will be an uplift to identify housing need specifically and should be undertaken prior to and separate from considering how much of this need can be accommodated in a housing requirement figure.

Circumstances where this may be appropriate include, but are not limited to:

- where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals);
- where strategic infrastructure improvements are planned that would support new homes;
- where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground;

In addition authorities should also consider:

- previous delivery levels. Where previous delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need; and
- recent assessments of need, such as a Strategic Housing Market Assessments (SHMA). Where these assessments suggest higher levels of need than those proposed by a strategic policy-making authority, an assessment of lower need should be justified.'

2.9 It is also noted that paragraph 60 states the standard methodology should be utilised to determine the minimum number of homes needed - 'unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and signals'.

2.10 Bearing in mind the standard methodology figure is a minimum figure, and noting the aforementioned guidance in the NPPG (as quoted above), it is clearly not logical to assume that 'exceptional circumstances' have to be demonstrated to justify the use of a higher Local Plan figure. Indeed, the Government's objectives are to boost housing supply and any authority that can sustainably deliver more homes will undoubtedly be welcomed.

2.11 The exceptional circumstances test, therefore, must apply to any authority which chooses to justify and deliver a lower housing needs requirement as its starting point for the Local Plan preparation. Notwithstanding this, we consider there are compelling reasons and some exceptional circumstances that would warrant Rossendale opting for a higher housing need requirement, which we address shortly.

2.12 Taylor Wimpey also have some fundamental concerns with the standard methodology as a whole. Notably, the standard methodology removes additional economic growth and instead pegs the housing requirement to past trends and development patterns. At its starkest, this significantly accentuates existing inequalities across certain geographies, such as the north/south divide, but it can also be witnessed, and lead to disparities, at more local levels too.

2.13 The standard methodology is also based on a top down assessment stemming from the government's national target of 300,000 homes per year, based on the 2014 projections. Notably, the 2014 projections were the latest available at the time in November 2017 and supported total growth of 266,000 dpa, so 10% short of the 300,000 figure. In short, the methodology is retrofitted.

2.14 It is pertinent to note that the government have now acknowledged this issue. At the outset of the NPPG section entitled 'Housing Need Assessments', the following statement is made:

'The government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically, it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018.

In the housing white paper the government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September 2018. We will consult on the specific details of any change at that time. It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid-2020s."

2.15 Whilst we have not yet seen or reviewed how the government intends to change the methodology, it seems likely that the basic methodology and inputs will stay the same (i.e. government projections with adjustments for affordability market signals and some form of cap) and that the caps and adjustments will simply be increased to meet the higher requirement. If this is the case, it will clearly exacerbate existing trends and accentuate inequalities even further. However, we will need to see what the Government propose, and we will respond accordingly.

2.16 What is clear is that there is still some uncertainty relating the standard methodology and the approach to be used. Therefore, we do not believe Rossendale should fundamentally rely on the standard methodology until the issues set out above are addressed, and we reiterate again, that even when it is utilised it must be treated as a minimum requirement and is simply the starting point for determining the number of homes a Local Plan must provide. It does not represent a cap and its use does not automatically result in a sound plan where all development needs are met.

2.17 Based on past and anticipated employment growth within the area, we believe there are sound reasons within Rossendale that would support an uplift from the standard methodology to support economic growth and these could be regarded as representing 'exceptional circumstances', notwithstanding our comments above. Moreover, this Local Plan process represents an ideal opportunity to address any shortfalls or mismatch between the standard methodology approach and the government's overall target for 300,000 homes are built per year.

Strategic Housing Market Assessment (SHMA) December 2016

2.18 The most recent SHMA was produced in December 2016 by Lichfields and suggested that Rossendale's objectively assessed housing need (OAN) was between 265-335 dpa, and Rossendale took a requirement of 265 (the low end of this range) forward as the housing requirement within the Regulation 18 plan.

2.19 We raised concerns with this figure at the time on the basis it did not take account of economic aspirations (as specifically required by the NPPF at the time), as employment-led needs suggested a range of 269-335 dpa. We also noted how a figure at the lower end of the OAN range provided no flexibility to take account of the potential unmet needs of adjacent authorities, not least the Greater Manchester authorities, that were anticipating substantial need issues as part of the GMSF process, with the Mayor

Andy Burnham also seeking to minimise Green Belt.

2.20 This assertion has been borne out, with the Green Belt Topic Paper confirming that the Greater Manchester Combined Authority have asked if Rossendale was able to meet any of their housing requirements.

2.21 As such we would continue to recommend a figure in excess of 265 dpa to take account of employment needs, and to provide some flexibility to accommodate any unmet needs from surrounding Greater Manchester authorities.

2.22 At the very least, the NPPG confirms that any figure lower than a recent SHMA (as the proposed 212 dpa figure is) must be fully justified, and it is our strong view that the Council have not done this within the plan as drafted.

Economic Growth Trends

2.23 More detailed interrogation of employment trends and assumptions that supported the SHMA provide further justification for a higher requirement and a departure from the standard methodology.

2.24 Between 2011 and 2015, total employment in Rossendale increased by 3.4% per annum, rising from 21,000 to 24,000. The majority of this growth occurred between 2014 and 2015 (circa 2,000). This level of annual growth was significantly higher than the corresponding increases in the North West (1.2% and England (1.7%). If you look at the most recent period of 2015-2016, employment in Rossendale fell from 24,000 to 22,000. All of these figures are taken from the Business Register and Employment Survey, published by the Office for National Statistics. The ONS data indicate that Rossendale's labour market performed well over the period 2011-15, before contracting over the more recent 12-month period from 2015-16. It is therefore helpful to consider what future growth will look like in Rossendale, by drawing on independent forecasts produced by Experian and Oxford Economics.

2.25 The December 2016 SHMA assesses a number of scenarios when considering future employment growth in Rossendale. These forecasts feed into calculations of future housing requirements in the District, which Lichfields conclude is in the range 269-335 dwellings per annum when the figure is employment-led. The lower figure in the range, 269 dwellings per annum, draws on baseline job forecasts produced by Experian in 2016 which are 'policy-off' – i.e. they take account of a range of macro-economic factors, including past trends. The policy-off forecasts do not consider the impact of public sector interventions such as infrastructure investment, sector growth strategies etc.

2.26 Over the period 2014-2034, the Experian forecasts estimate total job growth of 1,800 in the Borough – around 90 additional jobs annually. A separate baseline forecasting model, produced by Oxford Economics for Lancashire, indicates a similar level of annual growth over the next decade –approximately 100 new jobs each year. As an absolute minimum, Rossendale should be aiming to see jobs growth of at least 90-100 jobs per annum over the next 10-20 years. If it doesn't achieve this, the District could fall behind other parts of the sub-region. Rossendale currently accounts for around 4.0% of all jobs in Lancashire. If it does not grow at the levels forecast by Experian and Oxford Economics, it risks seeing its share of employment fall in the long-term.

2.27 Based on this, it seems reasonable to conclude that the figure of 269 dwellings per annum in the most recent SHMA should be the minimum starting point for considering annual housing requirements in Rossendale.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5174****Winfields Holdings Ltd and Winfields Ltd**

Number of supporters:

Commenting on

HS1: Meeting Rossendale's Housing Requirement

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Whilst the Government's standard methodology for assessing housing need reduces the apparent need for housing within the Borough, insufficient cognisance has been taken of the other aspirations of the Local Plan (principally with respect to employment growth). These cannot be realised without the amount of housing being increased, as restricting housing growth will significantly and adversely affect the strategy being pursued (as confirmed by the commentary included within the SHMA). There is a separate need to address the current housing deficit following a prolonged downturn in provision, which is no longer recognised by the policy (unlike the Regulation 18 consultation exercise). Given the significant shortfall, a buffer of 20% should be applied to the total provision for there to be a realistic prospect of achieving the land supply (as required by Paragraph 73, third bullet of the NPPF). Importantly, Policy HS1 seeks to increase the amount of housing delivered on brownfield sites (30% compared to the 20% referred to in the Regulation 18 Consultation). The commentary to the policy suggests that the supply of sites without significant constraint within the urban area is limited. However, it is noted there is a significant supply of land that has been identified for employment purposes since at least 1995 that has not come forward. As specified at Section 11 of the NPPF, planning policies should, inter alia, support mixed-use schemes and those which support the development of underutilised land and buildings, "especially if this would help meet identified needs for housing where land supply is constrained and available sites could be used more effectively" (Para 118, bullet (d)). Paragraph 120 goes on to confirm that planning policies should avoid the long term protection of sites allocated for specific uses (in this case employment) where there is no reasonable prospect of them coming forward for that purpose. The land at Hud Hey, the site specific aspects of which are considered later in this submission, is one such site. Other brownfield sites, including within 'the other places' identified by Strategic Policy SS, could also make a significant contribution to meeting housing need if that policy were also to be revised. Given the amount of unused previously developed land across the borough, the aspiration of achieving 30% for new dwellings on such land is supported. However, as highlighted above, flexibility needs to be incorporated into all pertinent policies, such as Strategic Policy SS and Policies EMP 2 and 3, to achieve this objective. As set out above, separate representations are made with respect to the status of land at Hud Hey (Policy EMP2-EE12) that could assist with meeting the objective of bringing forward brownfield sites in preference to releasing greenfield land, thereby meeting housing need in an appropriate fashion.

A more aspirational housing target nearer to the SHMA or even Regulation 18 consultation should be adopted in order to achieve the employment aspirations outlined by the Local Plan, or those aspirations should be brought in-line with the housing policy allowing a greater number of long term unused employment allocations to be released for housing. The alternative, as suggested when considering Policy EMP2, is to allow mixed uses of such sites, particularly if it supports a variety of plan objectives in a more considered and bespoke fashion.

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference **5176 Mr****Warren****Hilton****Highways England**

Number of supporters:

Commenting on

HS1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

'Strategic Policy HS1: Meeting Rossendale's Housing Requirement' sets out the borough's housing need up to 2034. It is noted that the methodology to calculate housing need has been changed to align with the revised National Planning Policy Framework (NPPF) which was published in July 2018. The revised local housing need is 3,180 homes to 2034 with 30% expected to be delivered on previously developed land; this is a reduction on the 4,000 homes stated in the previously consulted upon 'Draft Local Plan (Regulation 18)'.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section

12

Comments on policy HS02**Housing Site Allocations**

Bacup

Reference	97 Mr and Ms	John and Lynne	Atherton and Lomax	Moorside/Moor View Residents Group	Number of supporters:
Commenting on	-	HS2		Bacup	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer

We believe this plan is not sound because of the following reasons: Viability - The viability Assessment in the Local Plan completed in 2017 is not up to date and does not reflect the recommended approach or the standardised inputs or meet the transparency requirements - as explained in the Planning Practice Guidance (PPG). The issues with the local plan are: -Ignoring Public Interest - We do not believe that the allocation of 689 houses to Bacup meets the requirements shown in the Viability section of the PPG - at para 10, it states :- 'In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission.'The Core Strategy states on page 41, that the housing market in Bacup has failed – and Bacup has generally lower house prices than the rest of the borough - an economist would say that this indicates an oversupply of houses - just like there is an undersupply in more affluent areas of Rossendale. Also, the viability study (2017) shows that if any affordable housing is to be provided, that sites in Bacup are not viable, yet the National Planning Policy Framework (NPPF) on Page 17, at para 64, says that, 10% is a minimum provision of affordable housing that land owners and developers must supply. The provision of 10% affordable housing (68) that should be available for the people of Rossendale, is not going to be provided - the Council should not be allocating houses on land which are not viable. We think the Council have allocated houses in Bacup for no other reason than the land is available – ignoring the public interest. If these 689 houses were allocated in more affluent parts of the Valley, the minimum of providing 10% of affordable houses for the borough would easily be achievable and would probably achieve a higher percentage of provision (depending on housing zones – this could reach *40% (275) affordable houses - (*percentages as stated in Viability Study 2017). This would also help to reduce the affordability ratio to nearer 4%. In the Local Plan Strategic Topic Paper on page 10, it says, 'the construction of a range of housing types will help to diversify the stock away from predominant character of terraced properties and contribute to a wider regeneration of the area' – how does building on greenfield sites on the periphery of Bacup re-generate the area, with no funding available. The proposed building of these houses in Bacup will not produce any funds for regeneration. Diversify the housing stock away from terraced houses is not happening – the Council, with its development partner Barnfield, are building new terraced houses in Bacup (plan no. 2018/0383) – their original planning permission was to build semi-detached. Brownfield Land - The Council did a survey of all the brownfield sites in the borough – finding 185 hectares of brownfield land – after consideration they deemed that 42 hectares of brownfield land could be built on but leaving 143 hectares undeveloped. No monies have been identified in the plan to re-generate any of the 143 hectares of brownfield sites left undeveloped. The Council must have a plan - even if half of these sites could be re-generated there would be enough brownfield land to build 3,000 houses which has been shown to be the preference of most of the residents in Rossendale. It is far too easy for the Planning Department to build on greenfield sites . The Council have reduced the target of building on brownfield sites from 65% in the Core Strategy to a 30% target in the proposed plan – totally disregarding the majority of Rossendale Borough residents' survey after survey, which has shown their preference for re-generating the brownfield sites to enhance our borough, rather than building mostly in the countryside. Most houses in Bacup have already been built on greenfield sites and most of the allocations of houses in the new plan will be on greenfield sites and the Council is encouraging development in the countryside on the periphery of Bacup. Transport - The latest report of road congestion in the country from the National Infrastructure Commission, shows Accrington and Rossendale is the most congested area outside of the major cities and it puts Accrington and Rossendale at position 26 on their congestion list of all authorities. The council's own consultants reporting their findings on the road network – have reported that many of the junctions and mini roundabouts, particularly at the Toll Bar in Stacksteads and the two mini roundabouts at the Waterfoot/Cowpe road junction and the Rawtenstall gyratory are creating severe traffic congestion at peak times and the peak times are getting longer. In the NPPF July 2018, at para 109, it states, 'Development should only be prevented or refused on highways grounds if there would be unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'. Due to serious accidents, there are 8 speed cameras in place over approximately seven miles, from Tonacliffe Road in Whitworth, through Bacup, to the Hare & Hounds pub on Newchurch Road in Stacksteads - we believe the road congestion in Rossendale (A681 , A671) is already severe and is impacting on safety. With the proposed 689 houses to be built in Bacup, this can only increase the severity of

congestion on the roads and with no monies from developers to help with infrastructure (as Bacup is a low-cost area) – the sustainability of building these houses on the periphery of Bacup should be called into question, if built before the necessary infrastructure has been identified and the funding agreed with Lancashire County Council. A defined infrastructure plan must be in place before any houses are built, with an agreed timetable and completion date. The Council have raised the issue of their ambition to create a commercial railway line to Manchester from Rawtenstall – we do not understand the reasons why the Council is raising this railway issue in the current plan – it is creating a diversion from the much more important issue of solving the road network congestion problems today. Jobs - The Local Plan shows most new job opportunities will be sited in Rawtenstall, Haslingden and Rising Bridge, also along the A56/M66 corridor and the Council is planning to build 689 houses in Bacup – at the other end of the valley – why are jobs and houses being planned at opposite ends of Rossendale? - making the houses unsustainable. Also, the Council have indicated to Manchester Council Planning Department that the jobs that will be created by Manchester’s re-development of the M66 Corridor, would be attractive to the residents living in Rossendale – these jobs are at the opposite ends of the valley where the plan is to build 689 houses in Bacup. Development High Risk Area and Flooding - Many of the houses allocated to the northern periphery of Bacup are on land designated as Development High Risk areas by the Coal Authority, as shown on its interactive map page. This land is criss-crossed with old shallow coal mine workings, mine shafts, mine entrances and all will require expensive and extensive land engineering work. The usual way this is done is by drilling and grouting the land, giving it a waterproof shield. This alters the hydrology of the land in ways that cannot easily be predicted but by filling in the mine voids, mine shafts and audits, this must reduce the capacity of the land to absorb and hold water and therefore send more water at a faster rate into the river system. Most of the development in Bacup and Weir will alter the land artificially and as the climate changes, there will be more abnormal weather events, creating more and more tragic flooding in Rossendale, through Bury and onto Manchester (as on Boxing Day 2015 in Rossendale). The Council should start to insist that sustainable drainage systems are built on every development to reduce the amount of water going into the river system and if land owners and developers cannot afford to pay for a system – they should not be allowed to build houses.

The Planning Department and the Council must get tougher. It cannot be right that land owners and developers can make a profit out of the misery of flood victims further down the valley - there should be no concessions made to developers and land owners regarding surface water run off rates. There must be something fundamentally wrong with the way the catchment area of the river and its’ tributaries have been managed north of Bacup, which is 850 feet above sea level and 1 ¼ mile from the river’s source and still it floods on a regular basis. Ignoring Section 17 of NPPF and Mineral Safeguarding Areas - Large sections of land allocated for houses in Bacup is situated in a Mineral Safeguarding Area. In section 17 of the NPPF, at para 206, it states, ‘Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working’. The Planning Department has disregarded the NPPF’s section on Mineral Safeguarding and the required procedures for dealing with minerals has not been addressed in the plan. In section 17 of the NPPF, page 58, at para 204 c) it states, ‘safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)’. The minerals may not be worked in an area but the point of land being in a Mineral Safeguarding Area is to protect the area for the future. These Mineral Safeguarding Areas in Bacup were situated outside of the Urban Boundary - the Planning Department have moved the boundaries so that the mineral areas are now within the Urban Boundary and have allocated this land for housing. Moving the boundaries does not move the minerals – they are still situated on the land and if the land is built on, the minerals will be sterilised. Why has the Council allocated such a large amount of land in a low-cost area in Bacup? where development would have difficulty in meeting the policy requirements, as set out in the Local Plan. To add to these difficulties, the majority of the land also requires extensive engineering work to mitigate past mining legacy in Bacup. Regards, from John Atherton and Lynne Lomax and on behalf of Moorside/Moor View residents’ group.

We believe this plan is not sound because of the following reasons: Viability - The viability Assessment in the Local Plan completed in 2017 is not up to date and does not reflect the recommended approach or the standardised inputs or meet the transparency requirements - as explained in the Planning Practice Guidance (PPG). The issues with the local plan are: -Ignoring Public Interest - We do not believe that the allocation of 689 houses to Bacup meets the requirements shown in the Viability section of the PPG - at para 10, it states :- ‘In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission.’ The Core Strategy states on page 41,

that the housing market in Bacup has failed – and Bacup has generally lower house prices than the rest of the borough - an economist would say that this indicates an oversupply of houses - just like there is an undersupply in more affluent areas of Rossendale. Also, the viability study (2017) shows that if any affordable housing is to be provided, that sites in Bacup are not viable, yet the National Planning Policy Framework (NPPF) on Page 17, at para 64, says that, 10% is a minimum provision of affordable housing that land owners and developers must supply. The provision of 10% affordable housing (68) that should be available for the people of Rossendale, is not going to be provided - the Council should not be allocating houses on land which are not viable. We think the Council have allocated houses in Bacup for no other reason than the land is available – ignoring the public interest. If these 689 houses were allocated in more affluent parts of the Valley, the minimum of providing 10% of affordable houses for the borough would easily be achievable and would probably achieve a higher percentage of provision (depending on housing zones – this could reach *40% (275) affordable houses - (*percentages as stated in Viability Study 2017). This would also help to reduce the affordability ratio to nearer 4%. In the Local Plan Strategic Topic Paper on page 10, it says, ‘the construction of a range of housing types will help to diversify the stock away from predominant character of terraced properties and contribute to a wider regeneration of the area’ – how does building on greenfield sites on the periphery of Bacup re-generate the area, with no funding available. The proposed building of these houses in Bacup will not produce any funds for regeneration. Diversify the housing stock away from terraced houses is not happening – the Council, with its development partner Barnfield, are building new terraced houses in Bacup (plan no. 2018/0383) – their original planning permission was to build semi-detached. Brownfield Land - The Council did a survey of all the brownfield sites in the borough – finding 185 hectares of brownfield land – after consideration they deemed that 42 hectares of brownfield land could be built on but leaving 143 hectares undeveloped. No monies have been identified in the plan to re-generate any of the 143 hectares of brownfield sites left un-developed. The Council must have a plan - even if half of these sites could be re-generated there would be enough brownfield land to build 3,000 houses which has been shown to be the preference of most of the residents in Rossendale. It is far too easy for the Planning Department to build on greenfield sites . The Council have reduced the target of building on brownfield sites from 65% in the Core Strategy to a 30% target in the proposed plan – totally disregarding the majority of Rossendale Borough residents’ survey after survey, which has shown their preference for re-generating the brownfield sites to enhance our borough, rather than building mostly in the countryside. Most houses in Bacup have already been built on greenfield sites and most of the allocations of houses in the new plan will be on greenfield sites and the Council is encouraging development in the countryside on the periphery of Bacup.

Transport - The latest report of road congestion in the country from the National Infrastructure Commission, shows Accrington and Rossendale is the most congested area outside of the major cities and it puts Accrington and Rossendale at position 26 on their congestion list of all authorities. The council’s own consultants reporting their findings on the road network – have reported that many of the junctions and mini roundabouts, particularly at the Toll Bar in Stacksteads and the two mini roundabouts at the Waterfoot/Cowpe road junction and the Rawtenstall gyratory are creating severe traffic congestion at peak times and the peak times are getting longer. In the NPPF July 2018, at para 109, it states, ‘Development should only be prevented or refused on highways grounds if there would be unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’. Due to serious accidents, there are 8 speed cameras in place over approximately seven miles, from Tonacliffe Road in Whitworth, through Bacup, to the Hare & Hounds pub on Newchurch Road in Stacksteads - we believe the road congestion in Rossendale (A681 , A671) is already severe and is impacting on safety. With the proposed 689 houses to be built in Bacup, this can only increase the severity of congestion on the roads and with no monies from developers to help with infrastructure (as Bacup is a low-cost area) – the sustainability of building these houses on the periphery of Bacup should be called into question, if built before the necessary infrastructure has been identified and the funding agreed with Lancashire County Council. A defined infrastructure plan must be in place before any houses are built, with an agreed timetable and completion date. The Council have raised the issue of their ambition to create a commercial railway line to Manchester from Rawtenstall – we do not understand the reasons why the Council is raising this railway issue in the current plan – it is creating a diversion from the much more important issue of solving the road network congestion problems today. Jobs - The Local Plan shows most new job opportunities will be sited in Rawtenstall, Haslingden and Rising Bridge, also along the A56/M66 corridor and the Council is planning to build 689 houses in Bacup – at the other end of the valley – why are jobs and houses being planned at opposite ends of Rossendale? - making the houses unsustainable. Also, the Council have indicated to Manchester Council Planning Department that the jobs that will be created by Manchester’s re-development of the M66 Corridor, would be attractive to the residents living in Rossendale – these jobs are at the opposite ends of the valley where the plan is to build 689 houses in Bacup. Development High Risk Area and Flooding - Many of the houses allocated to the northern periphery of Bacup are on land designated as

Development High Risk areas by the Coal Authority , as shown on its interactive map page. This land is criss-crossed with old shallow coal mine workings, mine shafts, mine entrances and all will require expensive and extensive land engineering work. The usual way this is done is by drilling and grouting the land, giving it a waterproof shield. This alters the hydrology of the land in ways that cannot easily be predicted but by filling in the mine voids, mine shafts and audits, this must reduce the capacity of the land to absorb and hold water and therefore send more water at a faster rate into the river system. Most of the development in Bacup and Weir will alter the land artificially and as the climate changes, there will be more abnormal weather events, creating more and more tragic flooding in Rossendale, through Bury and onto Manchester (as on Boxing Day 2015 in Rossendale). The Council should start to insist that sustainable drainage systems are built on every development to reduce the amount of water going into the river system and if land owners and developers cannot afford to pay for a system – they should not be allowed to build houses. The Planning Department and the Council must get tougher. It cannot be right that land owners and developers can make a profit out of the misery of flood victims further down the valley - there should be no concessions made to developers and land owners regarding surface water run off rates. There must be something fundamentally wrong with the way the catchment area of the river and its' tributaries have been managed north of Bacup, which is 850 feet above sea level and 1 ¾ mile from the river's source and still it floods on a regular basis. Ignoring Section 17 of NPPF and Mineral Safeguarding Areas - Large sections of land allocated for houses in Bacup is situated in a Mineral Safeguarding Area. In section 17 of the NPPF, at para 206, it states, 'Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working'. The Planning Department has disregarded the NPPF's section on Mineral Safeguarding and the required procedures for dealing with minerals has not been addressed in the plan. In section 17 of the NPPF, page 58, at para 204 c) it states, 'safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)'. The minerals may not be worked in an area but the point of land being in a Mineral Safeguarding Area is to protect the area for the future. These Mineral Safeguarding Areas in Bacup were situated outside of the Urban Boundary - the Planning Department have moved the boundaries so that the mineral areas are now within the Urban Boundary and have allocated this land for housing. Moving the boundaries does not move the minerals – they are still situated on the land and if the land is built on, the minerals will be sterilised. Why has the Council allocated such a large amount of land in a low-cost area in Bacup? where development would have difficulty in meeting the policy requirements, as set out in the Local Plan. To add to these difficulties, the majority of the land also requires extensive engineering work to mitigate past mining legacy in Bacup. Regards, from John Atherton and Lynne Lomax and on behalf of Moorside/Moor View residents' group.

Do you wish to participate to the Examination In Public? **Yes**

Reasons We would like to discuss issues further all the issues we have noted at question no. 8

H10; H38; H53; H65; H73

Reference **5154 Mr**

Philip

Carter

Environment Agency

Number of supporters:

Commenting on

HS2

H10; H38; H53; H65; H73

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Our previous comments on the Regulation 18 consultation stated that several of the proposed residential allocations are subject to constraints that may impact on compliance with the National Planning Policy Framework (NPPF).

Issue The submission version of the Local Plan has partly addressed our previous recommendations. However, in reviewing the amendments and trying to cross reference site allocations with SFRA recommendations, it appears that several sites with potential high flood risk issues (i.e. sites affected by Flood Zone 3) have not been subject to SFRA and a Level 2 assessment (where necessary).

In particular, Site H53 Waterfoot Primary School remains in Flood Zone 3, has not been assessed through the SFRA and continues to be allocated for a more vulnerable land use without sufficient evidence. We raised this issue in our representations on the Regulation 18 consultation and until it can be shown that the site can be developed safely, we must object to this allocation.

As well as H53, the following sites also seem not to have been considered through the SFRA process specifically in relation to the presence of Flood Zone 3. They many have flood risk issues that need to be addressed:-

- 10 Land at Bury Road, Rawtenstall
- 38 Land off Burnley Road and Meadows Avenue
- 65 Albert Mill, Whitworth (assessed in SFRA for employment as site SFRA306 Side By Pass - Ewood Bridge; are SFRA recommendations still valid for residential development?)
- 73 Edenwood Mill, Edenfield

Impact The LPA cannot demonstrate that these sites satisfy the sequential test and that sufficient evidence is available to allow the LPA to be satisfied they could satisfy the exception test.

Solution Provide sufficient evidence that these sites comply with the NPPF and that they can be developed safely. This evidence could be in the form of a supplement to the SFRA where necessary.

NB// We have only considered those site bordering high risk flood zones (i.e. Flood Zone 3). Where sites are in Flood Zone 2, they will still need to satisfy the Sequential test so we recommend that you cross reference sites assessed through the SFRA with proposed allocations in the Local Plan to ensure all sites have sufficient flood risk evidence to support their allocation.

Issue While Main River watercourses are defined in the glossary, the presence of a Main River and potential impact on site layout are not acknowledged in Policy HS2 or anywhere else in the plan.

Impact Proposal layouts will be affected by the presence of Main River watercourses and the density of development may be lower than expected due to the need to allow access to these rivers for maintenance and repair purposes.

Solution In addition to identifying what a Main River is, sufficient wording should be added to a relevant policy or supporting text to ensure the limitations of developing next to a Main River are understood

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

H12

Reference **104 Miss Jennifer Ives** - Number of supporters:

Commenting on - H12

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

In regards to the proposed planning for Reedsholme Works. Having travelled burnley road twice daily in rush hours for over 20 years it astounds me that anyone in their right mind would consider introducing increased traffic to this area. Not only is the road itself barely fit for purpose, the education and health care systems in this area are not equipped or appropriately funded to manage such an influx to their numbers and the standards of care and service will inevitably plummet further as the services struggle to cope with such an increase in population. Please reconsider the plans to build more unwanted houses in this area!! The proposed development at Edenfield is equally as ludicrous, our existing infrastructure in Rossendale cannot take any more, I assume the investment into this will continue to be poor and disproportionate.

Do you wish to participate to the Examination In Public? **No** Reasons -

H13

Reference **19 Mr John Dawson** - Number of supporters:

Commenting on H13

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

WRT compliance, sufficient and proper notice to residents (especially those directly affected) was not given.

Earlier this year LCC wrote to those residents of Loveclough Park and Penny Lodge Lane whose properties back onto the public footpath surrounding the estate requesting residents not to dispose of their garden waste over their fences and onto the footpath. The inclusion of the field at the rear of Loveclough WMC (H13) (which borders to the other side of the same footpath at the rear of my property) into the local plan is of far greater importance and should have warranted a similar correspondence from RBC.

WRT soundness, I am extremely concerned what the effect on the dissipation of flood water would be if field H13 were to be built on.

Those of us from this estate who were heavily involved in clearing debris from drainage points on Boxing Day 2015 remember only too well how much flood water was pouring down the field and through our neighbours garage and then on past our houses to Limey Water.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	47 Mrs	Kerry	Crompton-Harris	-	Number of supporters:
Commenting on				H13	
Is the Local Plan legally compliant?	No	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	No
<p>SOUNDNESS - there has been a manifest failure to consult myself and those other residents most affected by the last minute additions. As a corner plot on Loveclough Park, I am directly affected on two sides of my property by H13 Loveclough WMC and land to rear. Having moved to this property in November 2017, non of these plans were notified on the extensive planning surveys conducted, additionally should it not have been for the local community group then I would not have known as the councils intention as they have made absolutely no effort to make direct contact with affected residents and therefore, I consider this to be a LEGAL breach within the consultation process. Further soundness concerns relate to the lack of consideration in regards to the increase risk of flooding, which the land around H13 is affected by and therefore, I am concerned as to the potential affects on my personal property. Additionally, the plan makes no considerations towards the impact on the local community i.e. the only primary school in the area is full to capacity with no immediate plans of growth, the road infrastructure is already in desperate need of investment with Rossendale recently being quoted as being one of the worst areas in the country, public transports links are weak and health services are severely lacking (we struggled to register with a GP and have been unsuccessful to date with registering with any local dentist and therefore, are required to travel out of the borough for treatment). Increasing the population size of this tiny village will only push current infrastructure beyond capacity, with the local plan making no consideration towards any level of investment and further development. The plan takes no consideration for local nature in an area where nature is prevalent in bats, birds, badgers, foxes etc. I have personal concerns in regards to the impact on light and noise around my property, also potential detrimental impacts on my families health (wife & 2yrs old child) who suffer from severe asthma (which was one of the reasons we moved from city living). Building could takes years to complete and therefore, will affect us greatly. Additionally, building around my property will result in financial loss to my family as such will undoubtedly reduce the value of my property.</p> <p>The local plan makes no consideration into the development of brownfield land, which should be considered in advance of changing rural land into building land. I am sure that property investors interest will be high for the area of Loveclough as they would consider this to be prime building land, granting such application on H13 will only open such for further applications which could then push the boundaries and result in direct detrimental impact to an area of considerable natural beauty. Additionally, the plan makes no comment on the 1400 vacant properties across the borough, which should be taken into consideration when considering the local planning requirements of the area.</p>					
Do you wish to participate to the Examination In Public?	No	Reasons	-		

Reference **77 Mr Vic Brailey** - Number of supporters:
 Commenting on Corporation St Loveclough - H13

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

I wish to register my strong objection to the inclusion of the land adjacent to Commercial Street, Loveclough in the housing development plan. The reasons for this objection are as follows:

- 1. Preservation of the country side.** East Lancashire has been at pains to lose the image of an industrial area and brand itself as Pennine Lancashire in order to attract a certain category of visitor who would contribute to the economy of the area. Preservation of the countryside is a key element of this and protecting the land west of Burnley road is vital. In particular this area is on the route of the Rossendale Way and the Round the Hills walk and annually it attracts considerable numbers of walkers who visit Rossendale for the openness of its countryside.
- 2. Consultation.** This site was not included in the original plans or indeed in the first draft of the revised plans. It seems clear that it was not the original intention of the council to develop it. It is my understanding that it was included late because a developer submitted it at the last moment. Loveclough is an area of considerable natural beauty that would, of course be attractive to developers because of the potentially high profits to be made. This seems to me to be a deliberate strategy by the developer to push through a plan at the last minute and bypass much of the consultation process. This should not be condoned or supported by the council and developers should not be allowed to get away with these techniques.
- 3. Brown field sites.** It is my understanding that some brownfield sites are still available but suffer from polluted ground. Developers should be required to clear this ground rather than focus on the high profit areas. They should not be supported in submitting late bids in prime areas to bypass the consultation process.
- 4. Infrastructure:** Loveclough does not have the infrastructure to support a significant increase in the population. There are no shops and services within reasonable distance and the only small shop within walking distance has very limited supplies. The consequence of this is the increased use of cars adding to the already congested road. The local primary school is already full and could not take the increased number of children from the extra 150 families proposed. I understand that the school is willing to expand but as an ex-governor of the school I believe that such a move would be seriously detrimental to the character of the school and have a negative effect on the quality of the social education that it currently provides well. There is limited parking on the main road and the side roads around the school and an increase in pupil numbers would cause serious traffic issues and significantly increase the chances of injury to a child, there have already been accidents outside the school.

- 5. Cars in winter.** This is a major issue. In winter the roads in winter are regularly iced up. Residents who live off the main road move their cars onto the main road in order to ensure that they can use them for work. Already the increased parking following the developments around Badgercote have meant that the main road is at breaking point in the winter months. It is only a matter of time until a serious accident occurs. A significant increase in housing and the consequential car ownership would potentially bring the traffic flow to a halt and would certainly increase the chance of a serious, or even fatal accident occurring.
- 6. Commuting traffic.** At peak travel times there are long delays on the journey to Manchester, which is a prime route for many Rossendale residents. We regularly have to leave 2.5hrs to be sure of catching a train from Manchester which is not acceptable for a 20 mile journey. Much of the blockage through Rawtenstall and onto the bypass comes from traffic down Burnley road. An extra 150 houses in Loveclough, even assuming a proportion of them went to Burnley would, at minimum, add an extra 100 cars to this route. The level of delays that would occur would significantly increase pollution as well as having an impact on the economy of the area.
- 7. Environmental issues.** Reference has been made above to the increase in pollution resulting from a significant increase in traffic and travel delays. In addition, this area floods regularly. This has the effect of absorbing water from surrounding areas. Building on this land would almost certainly have a negative effect on the surrounding areas. There is a recently active Badger Sett in the area and a number of mature trees which would be removed in the development. Collectively this development would have a negative effect on the environment and the sustainable future of this countryside area.

In summary, although I understand the pressure that the council is under from central government, I ask the council to maintain the commitment that it made to avoid development to the west of Burnley Road in order to preserve the countryside aspects which are central to the attraction of Rossendale. Not to do so would set a precedent which would likely result in a ribbon development in the area, despite the principles of the plan. In addition it would cause major traffic issues, environmental damage and a destruction of the village aspects of Loveclough. Whilst there are other alternatives in brownfield sites these should be prioritised. Developers should not be allowed to cherry pick high value areas for a quick

profit.

Exclude the corporation st area of Loveclough as it was submitted late by the developer against the original strategy of the council. Take into consideration the impact on the environment and safety caused by the increase in traffic. Consider the lack of infrastructure in the area to support this level of development. Consider the impact on the countryside that is a key promotion of Rossendale.

Do you wish to participate to the Examination In Public? **No**

Reasons -

Reference **85 Mr Michael Dop** -

Number of supporters:

Commenting on - H13

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

First of all you would need to break this down into segments of housing, traffic/ infrastructure, basic need of any housing. To take the housing into account I would like to know why we should have houses overlooking and looking down into our houses. The level of difference between the houses on Loveclough Park and the land behind is approximately 3 metres which means we will definitely be overlooked and it would also block out the sun/ light first thing in the morning which means our quality of life is going to take a massive nosedive from having not been overlooked for the last 14 years. When we bought our house, we bought it predominately because we were not going to be overlooked and we would benefit from the light into our house, this, if the proposals go ahead would not be the case. You also have wildlife, ie; owls, bats & squirrels using the surrounding trees as a sanctuary and for me you cannot destroy this wildlife habitat at the drop of a hat as I believe that not just to be cruel but unjust. Secondly the traffic and infrastructure, as you may be aware by now Rossendale borough has been voted the worst for infrastructure and roads in the UK, based on that how can you consider building any more houses when you cannot even bring the roads up to an acceptable standard. Surely you would get the infrastructure correct first before even starting to build houses, the idea of closing the gate after the horses have bolted springs to mind. Having 215 houses per year equates to up to 430 more cars up to 300 or more children. Where do you anticipate putting all these cars and children when a) the roads are at breaking point and b) the schools in the area are over subscribed, not to mention the health centre and the parking for that too. I would also like to know why you would want to build 3180 houses in the next 15 years when you currently have over 1400 empty houses in the borough at this present time. Surely it would be a better idea to fill those first before you embark on a scheme which at its best is ludicrous. The fact is the area and the roads are not even geared up for this and as a consequence I can see people who have lived here for a number of years here, moving. Why should be put up with traffic congestion not just on the roads, but the motorways too. If by any pure miracle this is allowed to go ahead and the 1400 house that are currently empty get filled then you could end up with over 3000 vehicles in the borough with the possibility of over 2000 children in the first year alone. To me that is definitely not acceptable. The current council cannot even put the roads at an acceptable level now and they have had several years to do it, so why do you suddenly think that they are going to put the infrastructure in place when the houses are built. It is all words and hot air, the proof as they say is in the pudding and all they have done is spout out words with no action, so why should we believe them now. Just to put it in context, there are more holes in Rossendale Borough's roads than in the entire golf courses of Great Britain. Who would want to live here when a0 the roads are that bad and b0 being stuck in traffic for over several hours every day. Unfortunately I do not believe the council will do the infrastructure work as I believe they are like all politicians full of hot air and lies. Whilst I appreciate some of these comments do not fall into the above brackets they should still be considered as I believe they are equally important and form a good part of the reasoning why the houses should not be built here.

Move the whole scheme away from the green land to a brown land site and somewhere where it does not destroy the beautiful landsite and wildlife we currently enjoy. We moved here to this rural location because it was RURAL, not to have people looking into our hoses and taking away the sun light. Find another piece of land in another neighbouring town that it does not affect as much as it would do to us. As I am not a planner and have no access to any plans of land I would definitely say somewhere where is less chance of traffic build up and overcrowding.

Do you wish to participate to the Examination In Public? **Yes**

Reasons I think peoples voices should be heard and not just the voices of the council. They have had several years to put these roads and infrastructure right and they cannot do that correctly, so why should we trust and believe them on this We have lived here for 14 years and understand the area including the roads so we have a better understanding of the area than a bunch of councillors who have probably visited this area once in the last seven years.

Reference	5166	Hollins Strategic land	Number of supporters:
Commenting on	HS2	H13	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	Did not answer

/1 INTRODUCTION

1.1. PWA Planning act on behalf of Hollins Strategic Land (HSL) for the purposes of making Representations on the Rossendale Publication Draft Local Plan. This Representation Statement (RS) confirms that HSL supports the allocation of site H13 Loveclough for housing.

1.2. HSL has had discussions with, and met with, the LPA to discuss the land south of the Working Men’s Club on Commercial Street / Land to the west of Burnley Road, Loveclough included in allocation reference H13. For clarity the area of land is identified on the plan in Figure 1 below is the total extent of allocation H13 and the area of land HSL are interested in is shown in Figure 2 and is hereafter referred to in this RS as “the site”.

1.3. This RS recommends it is necessary for the capacity of H13 to be increased from 95 dwellings to 105 in order for the eLP to demonstrate that it is compliant with the sustainable development objectives of the National Planning Policy Framework (NPPF) and to be found sound.

1.4. The allocation of site H13 is fully supported as it is considered it has numerous planning benefits. These include; its containment adjacent to existing built development and planned developments; location adjacent to existing public open space and nearby recreational facilities; and sustainable location close to existing public transport and public rights of way. The benefits of the allocation are discussed further in this Statement in section 2.

/2 ALLOCATION H13 LOVECLOUGH

2.1. The emerging Local Plan (eLP) Policy HS2 allocates site H13 for residential development with a capacity of 95 dwellings. HSL supports the allocation but suggests the capacity be increased to 105 dwellings as it is considered that despite physical constraints on the site this number of units can be achieved and would maximise the development potential of the site whilst still being appropriate to the character of the area and respecting a density of 30dpa. This would be in accordance with national policy and achieving sustainable development and making the best and most efficient use of land.

2.2. The Council have acknowledged the Borough is constrained by topography, flood risk, highway capacity, Moorland and Green Belt and has reduced their housing requirement using the new standard approach. The evidence in the Council’s SHMA 2018 identified a housing need of 265-335dpa but concluded “at least 265dpa is sufficient to meet Rossendale’s housing need over the plan period.” However, the Council have re-worked their OAN using the standard methodology for calculating housing figures from 3,975 (265dpa) to 3,180 (212dpa) over the plan period (15 yrs). The Council is planning for a minimum housing requirement in order to boost the supply of housing; however PWA are firmly of the view that where there is potential for a site to deliver more housing, this should be taken advantage of. The increase in capacity would also allow for additional affordable housing for which there is an identified need in the local area.

2.3. The eLP confirms that part of the overall site (allocation H13) has outline permission for housing. This includes the Working Men’s Club (for 10 dwellings, reference 2013/0467 granted 11th March 2013) and the triangular shaped piece of land to its rear (2 dwellings, reference 2016/0478 granted February 2017).

2.4. This site and the wider allocation H13 represents the most sustainable development option. Crawshawbooth, to the south, is recognised as an Urban Local Service Centre; it has a primary school, shops, medical facilities and public transport links to Rossendale. Strategic Policy SS recognises Loveclough as a Rural Local Service Centre. The Council’s approach of designating development in this location is complaint with Strategic Policy Spatial Strategy, Policy SD1 and the overall drive for achieving sustainable developments in the NPPF.

2.5. It is appropriate for the Council to allocate land for housing in this location and is considered in accordance with the Council’s evidence base for the eLP where there is demand for deliverable high quality executive style homes. The allocation can also provide for a meaningful number of affordable houses to come forward (30%) in an area considered to be well served by sustainable travel options.

2.6. There are bus routes travelling in both directions on Burnley Road with stops close to the junction with Commercial Street. The bus services along this stretch of road are frequent, running every day of the week and providing connections to the wider area. To locate development in close proximity to these will maximise the potential for using

other more sustainable travel options than the private motor car. There are local shops serving the local area in the Local Service Centre of Crawshawbooth which are accessible by these services.

2.7. The site is contained with existing development to the north, east and west including Burnley Road forming the eastern boundary. To the south there is existing public open space and beyond that, further built development. The allocation of site H13 would represent a logical and organic extension to existing development, restricted by limits of existing development.

2.8. The Council has evidenced the market demand for housing in this area and demonstrated through its site assessment for the SHLAA that this allocation is sustainable. A number of constraints have been identified on the site. Hollins Strategic Land (HSL) has undertaken all of the survey work that would be required for the submission of a planning application and has considered an initial concept layout which is illustrated in figure 3 below.

2.9. The surveys that have been carried out demonstrate that the site constraints would not be prohibitive in the development of the site. The full documents are available to the Inspector on request. These include;

Landscape and Visual Impact Assessment and Concept Layout Plan (Influence);

Tree Survey (AWA);

Drainage Strategy and FRA (Betts Associates);

Ecological Survey (ERAP);

Heritage Assessment (Kathryn Sather Associates);

Phase 1 Desk Study (Brownfield Solutions);

Transport Assessment and Framework Travel Plan (SK Transport Planning);

Consultation with United Utilities.

2.10. The landscape assessment evaluates the impact of development of the site from a number of key viewpoints and illustrates that whilst there will be an initial impact from having a development on a site previously undeveloped, due to the topography of the land (rising to the east up to Burnley Road) and the existing surrounding development, the impact will not have a detrimental effect.

2.11. It considers the settlement to have an irregular pattern indicating how it has grown over time and that the allocation will respect this organic growth interrelating to the existing pattern of development in the immediate vicinity and the recreational area. This can be seen in Figure 4 below which shows the site in the wider area.

2.12. Furthermore, it is not considered that increasing the number of dwellings from 95 to 105 would have a negative impact in terms of landscape character or visual amenity. The images below in figure 5 captures the site in the context of the surrounding landscape and demonstrates how it will be contained by surrounding development.

2.13. The strategic location adjacent to existing public open space and the recreational area further promotes the suitability of this allocation which will link into this facility and enhance it, creating a social meeting place to the benefit of the community. The allocation is in close proximity to two existing public rights of way providing wider recreational links in the area, further promoting the recreational benefits of the site.

2.14. The heritage assessment considers the significance of any impact on the conservation area and concludes that due to the containment of the site there are limited views between which would have any detrimental impact on the heritage asset. Again, it is not considered that these impacts would be increased as a result of a greater number of dwellings on site.

2.15. The ecological assessment concludes that the site is feasible for residential development as there would be no adverse effect on the designated sites for conservation. Furthermore, with the retention and enhancement of existing ecological features there would be a net gain in biodiversity overall.

2.16. The Transport Assessment demonstrates that access can be gained to the site by a range of modes, including nearby bus routes that provide good coverage of local and regional destinations. It is also shown that access can be gained in reasonable journey times to local amenities and services. The proposed site access junction includes footways. A footpath link is also provided from the development to the existing Public Right of Way network located to the northwest of the site. The Transport Assessment also considers prevailing traffic and road safety conditions, and it is shown that access to the development can be gained within standard highway design parameters. It is also shown that the

addition of the development traffic on the network will not cause a severe impact on highway capacity or an unacceptable impact on road safety conditions.

2.17. Rossendale Council has undertaken a highway capacity study focusing on potential congestion over the plan period. This study recommends that no intervention should be necessary in the early stages of the plan, and identifies options for improvement over the latter period (2024-2034). The TA commissioned by HSL finds that there will be an immediate dispersal of traffic at the site access, with some travelling to/from the Burnley direction and some to/from Rawtenstall side. Overall, the development traffic would be split broadly evenly north and south. The traffic movements associated with development of the site would result in an acceptable level of traffic generation on the local highway network and the wider network. In conclusion, the development of the site would have a negligible effect on the findings of the Council's highway capacity study.

2.18. A flood risk assessment and drainage strategy has been prepared which confirms the site lies entirely in flood zone 1 and the site is low risk in terms of all sources of flood risk. United Utilities have confirmed there would be no objection to connection to the public sewer system for foul and surface waters.

2.19. HSL would welcome the opportunity to continue discussions with the LPA in order to ensure that Loveclough achieves sustainable development as early in the plan period as possible. We are firmly of the opinion that there are no environmental or technical constraints which would prevent the allocation coming forward and for a larger number of dwellings (105) than is currently being promoted by the Council.

/3 MASTERPLAN REQUIREMENT

3.1. Policy HS4 Loveclough in the eLP states that H13 is to be brought forward in line with a masterplan for the whole site. There is no specific calendar on the Council's website to expand on the timetable of the eLP. However, as publication does not expire until October 2018, it is not expected to be adopted until Summer 2019. There is always the possibility that the timetable could slip and the Masterplan, if adopted as a Supplementary Planning Document (SPD), would take several months to adopt.

3.2. It is therefore likely that a planning permission would not be granted for development in Loveclough until 2020. It is likely that the first approval(s) would be for outline permission and it would then take approximately 1 year for reserved matters to be approved and pre-commencement conditions to be discharged. This could take up to 2021/2022 provided permission is granted. Therefore, the first dwellings may not be completed until 2023/2024 at the earliest.

3.3. Rossendale has a significant and serious shortfall of deliverable housing land and has persistently under-delivered. It is considered that the eLP must look to secure development early in the plan period wherever possible, and for the greatest number of dwellings where they comprise sustainable development. There is an opportunity for H13 to come forward in advance of a Masterplan SPD and this would provide much needed housing, including affordable, earlier in the plan period.

3.4. The omission of the requirement for a masterplan for H13 in policy HS4 will not be inconsistent with Part One of the Local Plan and will not have a bearing on the soundness of Part Two of the Local Plan.

3.5. The requirement for a masterplan for H13 is onerous and will delay much needed housing in the borough which can be delivered in the short term. The site was assessed as part of the SHLAA as deliverable within 6 to 10 years. HSL believes this deliverability would in fact be much quicker and, subject to planning permission, would be within 5 years.

3.6. Policy HS4 identifies physical elements of the site including topography, access, landscape character and that 20% of the site is designated as a grassland Stepping Stone Habitat of regional ecological importance. Policy HS4 states "appropriate assessments regarding landscape, flood risk, impact on the heritage asset, ecology, coal legacy and mineral sterilisation will be required to support the development of this site. Rossendale Council therefore requires a Masterplan." This statement within policy HS4 that simply outlines submission requirements for an application does not justify the requirement for a masterplan as the aforementioned issues could be dealt with as part of any planning application submission, as has been demonstrated by the assessment work already undertaken for this site.

3.7. It is not considered a masterplan approach is required as the allocation only requires housing development and is not multi-faceted. Policy HS4 requires a contribution to expanding capacity at local school(s) to support the development and due to the proximity of the site to the Local Centre of Crawshawbooth, the development of this site is expected to identify and contribute to parking solutions within the Local Centre. It is within the Council's gift to require monetary contributions towards schemes identified for parking schemes and school expansions via a section 106 agreement, with a trigger for when these contributions should be paid, as part of the planning application process, and it is not considered that the development of this site without a masterplan would negate this requirement. HSL could make these contributions via the appropriate mechanism at the application stage.

3.8. The development of this site would not prejudice the wider H13 allocation (The WMC and triangular shaped piece of land to the rear of it) as these other parts of H13

already have planning consent. Whilst in landscape terms the sites would be viewed together from certain viewpoints, as these two other areas of land have planning permission this can be taken into account in a planning application.

3.9. Policy HS4 identifies the development of the site should take into account measures to deal with minerals. It is considered that this can be adequately dealt with via an assessment submitted with an application and the policy makes clear this requirement. In any case, it is expected the Borough's housing need would surpass the requirement for minerals on the site, as demonstrated by the fact that the Council have accepted this site as a housing allocation.

3.10. For the plan to be found sound it is considered that the requirement for a masterplan for allocation H13 is omitted as the requirement is not justified nor effective in delivering much needed housing.

/4 CONCLUSION

4.1. This RS supports the eLP and demonstrates that it is necessary for:

- the capacity of site H13 be increased to 105 dwellings in order for the eLP to be compliant with the sustainable development objectives of the NPPF to make the best and most efficient use of land;
- the eLP to ensure that development is achieved in Loveclough as soon as possible and to be able to do so that the LPA should not seek to adopt an unnecessary Masterplan approach in relation to allocation H13;
- the eLP to ensure that Loveclough makes use of the most locationally sustainable sites which can provide an organic extension to the village, as is the case with H13.

4.2. This RS supports the allocation of H13 in the eLP as it is considered to:

- be a logical and sustainable extension to Loveclough;
- deliver much needed housing in the first five years of the Plan;
- provide a good quality housing mix sought by the Council including executive style and affordable housing;
- enhance and provide meaningful links to the existing green infrastructure and extend existing public open space;
- be in a sustainable location well served by frequent bus services to the wider area;
- be well contained adjacent to existing built development and represent an organic extension to Loveclough.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H15

Reference **89 Mr Mark Lupton** - Number of supporters:

Commenting on - SHLAA 16187 / Housing Allocation H15 H15

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

I question the soundness of the judgement to include Housing Allocation H15 in the Draft Local Plan and whether proper assessment and consideration has been carried out in relation to this proposal.

Housing Allocation H15 should be removed from the Local Plan.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	5137	J A	Savill		Number of supporters:
Commenting on				H15	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>Comments on local draft plan Ref: 16187 and HS2.45 Willow Avenue off Lime Tree Grove</p> <p>There are a number of issues which do not favour the development of this site but I will limit my comments to the two most obvious planning objections.</p> <p>Firstly the site looks inadequate for 10 houses even from the satellite view. When you look at the site from ground level you see that it consists of a smallish plateau and a steep drop. To build any houses there would require extensive earth movements and engineering and the stability of the land and surrounding houses must surely be very carefully considered, especially those below in Cribden Street.</p> <p>Secondly there is no really feasible access to this site. Willow Avenue is a single track private lane maintained by the three dwellings on it. Access to Willow Avenue is via Lime Tree Grove off Burnley Road and there is already signage here saying "No Through Road" and "Unsuitable for motor vehicles".</p> <p>Lime Tree Grove is a steep, twisting, single track lane with dry stone walling on both sides and has no passing places. The turn into Willow Avenue is difficult to negotiate by vehicles larger than a car.</p> <p>Lime Tree Grove is also used extensively by children walking to school, dog walkers and joggers. To increase traffic on this road would make it extremely dangerous.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference **5159 Mr Kevin Thomas Aspin**

Number of supporters:

Commenting on **HS2** **H15**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Rossendale Draft Plan

Ref: 16187 and HS2.45

Following a telephone conversation with X at the Forward Planning department on 27/10/17 regarding the Draft Local Plan for Rossendale, we believe that there was an SHLAA assessment of the land bordering Nos. 31- 37 Slaidburn Avenue, Constablee, Rawtenstall and the possible use of this land for constructing 10 housing units.

An objection was raised regarding this same plot in the past (pre-2005 - Your ref: BSS/WE/88/575) and we believe it was deemed to be unsuitable for building at that time.

Following an email received yesterday, we understand that the cut-off date for initial objections to this Draft Plan is 5/10/18 and therefore in view of this we wish to make the following comments:

- The properties on the West side of Slaidburn Avenue would be overlooked by any development and would suffer a loss of amenity i.e. open aspect/ outlook as well as a marked loss in financial value of the properties.
- We feel that there must be some measure of doubt as to the suitability of the site in view of a severe land fall away along the edge of the proposed site.
- The access to the site is solely from Lime Tree Grove via Willow Avenue. This would take on even greater significance given earlier concerns regarding traffic volumes using Lime Tree Grove which resulted in traffic bollards and reduction to a one-way system below Willow Avenue. The concerns regarding safety which preceded the restriction on Lime Tree Grove would be all the more relevant with the traffic increase from any development on this site. Most especially if vehicles had to reverse back onto Burnley Road and into oncoming traffic.
- Emergency vehicles need adequate road width access to houses. Lime Tree Grove is 8 feet wide at its narrowest point. Willow Avenue (a private road) is also narrow and vehicles parked there could create a problem for increased numbers of passing traffic.
- The site/ piece of waste land in question provides a valuable 'soak away' for rain water and, in the event of heavy rain, reduces the amount of water moving down the slope and affecting properties on Burnley Road.

We trust that you will acknowledge our concerns and look forward to hearing from the department regarding next steps.

This letter is supported by residents living at:

X Willow Avenue

At the present time my tenants of XWillow Avenue have to park on the pavement to allow ease of access for the tenants at X Willow Avenue.

There is not enough room for access of delivery / building materials wagons.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5161 Ms	Pam	Anthony		Number of supporters:	12
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Commenting on		HS2		H15
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Rossendale Draft Plan

Ref: 16187 and HS2.45

Following a telephone conversation with Ann Storah at the Forward Planning department on 27/10/17 regarding the Draft Local Plan for Rossendale, we believe that there was an SHLAA assessment of the land bordering Nos. 31 – 37 Slaidburn Avenue, Constablee, Rawtenstall and the possible use of this land for constructing 10 housing units. An objection was raised regarding this same plot in the past (pre-2005 - Your ref: BSS/WE/88/575) and we believe it was deemed to be unsuitable for building at that time. Following an email received yesterday, we understand that the cut-off date for initial objections to this Draft Plan is 5/10/18 and therefore in view of this we wish to make the following comments:

- The properties on the West side of Slaidburn Avenue would be overlooked by any development and would suffer a loss of amenity i.e. open aspect/ outlook as well as a marked loss in financial value of the properties.
- We feel that there must be some measure of doubt as to the suitability of the site in view of a severe land fall away along the edge of the proposed site.
- The access to the site is solely from Lime Tree Grove via Willow Avenue. This would take on even greater significance given earlier concerns regarding traffic volumes using Lime Tree Grove which resulted in traffic bollards and reduction to a one-way system below Willow Avenue. The concerns regarding safety which preceded the restriction on Lime Tree Grove would be all the more relevant with the traffic increase from any development on this site. Most especially if vehicles had to reverse back onto Burnley Road and into oncoming traffic.
- Emergency vehicles need adequate road width access to houses. Lime Tree Grove is 8 feet wide at its narrowest point. Willow Avenue (a private road) is also narrow and vehicles parked there could create a problem for increased numbers of passing traffic.
- The site/ piece of waste land in question provides a valuable 'soak away' for rain water and, in the event of heavy rain, reduces the amount of water moving down the slope and affecting properties on Burnley Road.

We trust that you will acknowledge our concerns and look forward to hearing from the department regarding next steps.

Yours faithfully,

Pam Anthony

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5162 Mr & Mrs** **John and Helen** **Pilling**

Number of supporters:

Commenting on **HS2** **H15**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Rossendale Draft Plan
Ref: 16187 and HS2.45

Following a telephone conversation with Ann Storah at the Forward Planning department on 27/10/17 regarding the Draft Local Plan for Rossendale, we believe that there was an SHLAA assessment of the land bordering Nos. 31 – 37 Slaidburn Avenue, Constablee, Rawtenstall and the possible use of this land for constructing 10 housing units. An objection was raised regarding this same plot in the past (pre-2005 - Your ref: BSS/WE/88/575) and we believe it was deemed to be unsuitable for building at that time. Following an email received yesterday, we understand that the cut-off date for initial objections to this Draft Plan is 5/10/18 and therefore in view of this we wish to make the following comments:

- The properties on the West side of Slaidburn Avenue would be overlooked by any development and would suffer a loss of amenity i.e. open aspect/ outlook as well as a marked loss in financial value of the properties.
- We feel that there must be some measure of doubt as to the suitability of the site in view of a severe land fall away along the edge of the proposed site.
- The access to the site is solely from Lime Tree Grove via Willow Avenue. This would take on even greater significance given earlier concerns regarding traffic volumes using Lime Tree Grove which resulted in traffic bollards and reduction to a one-way system below Willow Avenue. The concerns regarding safety which preceded the restriction on Lime Tree Grove would be all the more relevant with the traffic increase from any development on this site. Most especially if vehicles had to reverse back onto Burnley Road and into oncoming traffic.
- Emergency vehicles need adequate road width access to houses. Lime Tree Grove is 8 feet wide at its narrowest point. Willow Avenue (a private road) is also narrow and vehicles parked there could create a problem for increased numbers of passing traffic.
- The site/ piece of waste land in question provides a valuable 'soak away' for rain water and, in the event of heavy rain, reduces the amount of water moving down the slope and affecting properties on Burnley Road.

We trust that you will acknowledge our concerns and look forward to hearing from the department regarding next steps.

Yours faithfully,

John and Helen Pilling

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5227	Samantha	Clarke		Number of supporters:
Commenting on		HS2		H15	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>I wish to object to this site on grounds of poor access. Lime Tree Grove is a steep winding one track lane with a difficult turning off Burnley Road it is bordered by stonewalls and has no passing places. An LCC sign at the bottom states 'Not suitable for Motor Vehicles'. Willow Avenue is a single track private unadopted road. The turn from Burnley Road, Lime Tree Grove itself and the tight turn into Willow Avenue is difficult for anything larger than a car and would be impossible for construction traffic to negotiate - even the Council refuse collections do not attempt to use this route.</p> <p>In its 2017 General Information on this site Rossendale Council stated under Suitability 'Vehicular access – access requires improvements' but I believe there is no option to widen either Lime Tree Grove or Willow Avenue to achieve this .Lime Tree 'Grove is much used by pedestrians, especially to access primary and secondary schools, any construction traffic or additional residential traffic movements after construction would make the lane much more dangerous for them than it is now.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			
H28; H29; H30; H33					

Reference	88 Mrs	Sue	Fletcher		Number of supporters:
Commenting on	-	Housing		H28; H29; H30; H33	
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Yes
<p>The infrastructure of Bacup is not capable of sustaining the increase in housing on the plan. There are insufficient primary school places (near sites H29, H30, and H28, and H33) . Both St Saviours School and Britannia are full, meaning that any children in these houses would have to attend a school further away thus involving being transported to school by car. The road network is already struggling to cope with the current users, and increasing the local population will just exacerbate the current problems. There are not enough Doctors and Dentists to cover this area now, so any increase in population will cause immense strain on an already stretched service. Many of the proposed housing development sites are on greenfield sites, and have public rights of way across them, any development will mean a loss of amenity, as these PROW will just become road and tarmac pavements. This will result in putting vulnerable road users (pedestrians, cyclists and horse riders) in much more dangerous situations.</p> <p>Either greatly reduce the number of houses to be built or greatly increase the local services and infrastructure to accommodate all the extra people. Provide alternative safe off road routes for vulnerable road users. Horse riders pay into the local economy at a high level, in terms of Livery fees, feed supplies, farriers, vets and other complimentary medical services, lessons etc. Therefore their needs should be considered in local planning especially regarding public rights of way, which should be maintained and not tarmaced and built over.</p>					
Do you wish to participate to the Examination In Public?	No	Reasons -			
H28; H29; H33; H39					

Reference **5145 Mr Rob Wells**

Number of supporters:

Commenting on

H28; H29; H33; H39

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Email received 05/10/2018:

I would like to object to the soundness of the local plan in the following areas:

H39, H33, H29 and H28 on the grounds of soundness of the plan.

These allocations within the Bacup area would provide a disproportionate quantity of the identified need. Bacup has very little employment areas and a high proportion of the residents have to travel through to the West of the Borough to the main transport links to the North West or up through Burnley. H29 and H39 have particular concerns with regards to access to main roads and traffic concerns / access to development. H29 has little obvious access through to build roads to the site and H39 is plagued with access issues.

H33 is on some very attractive woodland / green infrastructure and would represent a great loss in terms of amenity.

In addition, all of these allocations are taking away green infrastructure, loss of play areas for children, are not dealing with the brownfield areas first and present some real access problems with planning housing allocations on these plots.

The disproportionate allocation of housing provision within Bacup (quoted as being the 'least attractive' area of the Borough) has the greatest distance from A&E, police, high schools within the Borough and employment areas / transport links. The infrastructure plan fails to address these concerns and keeping these allocations within the plan will compound traffic flows on arterial routes within the borough, worsening the commute for thousands of residents and compounding the structural deficiencies in the provision of basic infrastructure.

The plan should move the housing allocations over to the West side of the borough where adequate provision of basic infrastructure is located and reduce the stress on the main road connecting the East to the West (Bacup to Rawtenstall).

Letter received 05/10/2018:

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H29

Reference **15 Mrs Janet Boon** - Number of supporters:

Commenting on Pennine Road Bacup H29

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

I strongly object to the proposed housing development sites proposed on land adjacent Pennine Road Bacup. This area has already been developed from farm land into a housing estate. This will take away the natural habitat of wildlife resident in the area. I know for a fact that deer have been seen grazing in these fields together with badgers, foxes and other animals. This land is used as public amenity land and myself and my dog regularly use this for recreational use walking. The amount of houses that have now been constructed in Bacup have lead to bad commuting problems with traffic at its busiest ever. The 2011 census told us that approximately 11,100 residents commuted to outlying areas. This has increased by another 2000 since 2011 and now you are proposing a further 3000. The road system through Bacup to all surrounding areas is just not programmed for this amount of traffic. There is no mention of alleviation to this problem i.e. trains or trams and we are supposed to tolerate it. The cost of this so called "affordable" homes guarantees that the owners/occupiers have to work to pay the mortgage/rent. This has not been thought through. Not only that how many new houses are still unoccupied. Who would want to live somewhere where you cannot get to other locations quickly and without stress. Our own children who grow into adults cannot afford these so called "affordable" homes and are having to leave the area. I moved to Bacup over 30 years ago with my horses for the beautiful countryside and to get away from busy Towns like Manchester and Salford. All you are doing is turning this quaint town into another major town with no infrastructure. The doctors are full, the schools are failing or overcrowded, the nhs cannot even offer a reliable health service now, heaven help us. As for shops, we have one supermarket and inadequate parking facilities to access the small shops we have available. People who come here come because of the beautiful countryside and you are going to take all that away. What will be left. Nothing but one great huge housing estate.

It will not be legally compliant as you fail to observe the opinions and objections that the local residents make. If you do not value countryside and wildlife as being beneficial to peoples perspective, then what is the point. These things which many of us take for granted are all relevant to ones well being. There is no soundness of plan as we are not provided with recommendations as to how we will overcome the infrastructure problems. We are not even advised of these plans with enough notice of envisaged projects before they are entered into. It is our town as well we should at least be given an opportunity of voicing our opinions before anything is written in stone.

Do you wish to participate to the Examination In Public? **Yes** Reasons It is imperative that residents thoughts and opinions are taken into consideration. These plans are the future of Bacup. We want to improve the town, to be proud of our town and to ensure that development and decisions are made for the right reasons

Reference	81 Mr	Jack	Rogers		Number of supporters:
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Commenting on	-	HS2	H29
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Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Yes
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As a local resident I am concerned that the proposed increase in housing will impact on a number of factors. The landscape, (which we chose as a primary reason to move to this location) will be changed dramatically for the worse. The roads will have to accommodate an increased number of vehicles, which at present are consistently breaking the speed limits endangering children (a child was hit not too long ago on Pennine Rd). The development itself will create untold heavy traffic on the roads. The added pollution and water run off from the development into the properties below may increase, and as the site H29 was apparently a former mining area, I wonder whether hazards will appear from this. The density of the housing already in this area feels high, being only alleviated by these green intervals between developments, and to fill them in, would lower the standard of living, our children play, our families walk through, and our eyes take them in as relief from the man made landscape found around us. I strongly believe these green areas between housing needs to be retained for the sanity and health of the residents, and that a scheme at H29 or H37 is of such a scale (80 plus units) that possibly even crime and health issues could be encountered. Please reconsider the size and /or location as spaces such as these are valid in their existence, as much as the need for homes are.

We believe that retention of the site as greenfield is necessary, or at the very least a reduction in the number of units proposed.

Do you wish to participate to the Examination In Public?	Yes	Reasons	-
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Reference	102 mr	alan	boon	-	Number of supporters:
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Commenting on	chapter i policicy hs22	H29
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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with relation to the areas named my objections are the following there is loss of amenities in particular to areas H29 and H41 these areas are well used by all residents surrounding those areas they are used for dog exercising as required under the animal welfare act, these areas are used by local children keeping them off the busy estate streets. these areas are used by local residents for walking and relaxing. these areas are used by the many horse owners keeping them off the roads and are used as access routes to bridleways that surround Bacup loss of these trails will lead to horses being exposed to busy roads and inevitably will increase the danger therefore reducing the amount of young riders able to enjoy the bridleways. in particular H41 currently houses 3 areas of use area 1 is a purpose built football/basketball pitch. Area 2 is a children's playground area 3 is a gated garden area with benches whilst an area is to be allegedly prepared after this loss it is unlikely to accommodate all 3 and is not guaranteed to built the houses proposed will lead to a vast increase in density of housing giving an unacceptable increase in motor traffic with an inevitable increase in children playing in the roads the danger of serious accident is increases in an area that already has an issue with traffic. the infrastructure in which the proposed houses are situated is totally unsuited to an increase in houses, doctors and schools are currently operating to near capacity the proposed houses would give an approximate increase of 25% in need for these facility's. an increase of 25% traffic in such a small area could be considered dangerous in what is essentially currently a already busy estate the area of Bacup is scheduled to accommodate 25% of the total housing being built in Rossendale changing forever the landscape for the people of Bacup this is clearly disproportionate to the needs of Rossendale as a whole.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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H29; H37; H41

Reference **5022 Mr Bryan William Hanson**

Number of supporters:

Commenting on

HS2

H29; H37; H41

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Sirs,

I am putting my objections in this letter as I don't understand the form you have put online. I see that if this form is not used then my objections won't be counted. I myself would challenge this as not being legal, so if my objections are not recognised I will be looking into this further.

My objections refer to the proposed houses to be built on the following sites.

Pennine Road#29

Gladstone St#37

Thornbank#41

Firstly I would like to object to the insufficient infrastructure to cope with the extra traffic these houses will create on a already busy estate, these roads are not meant to cope with the extra volume of traffic.

I also object about all the greenfield these houses are to be built on. These sites are used by lots of people in the community and (especially children as parents see these places as safe areas for there children to play)

Then theres the matter of all the wildlife that are on these fields whats going to happen to them, where will they go?

Then theres the matter of things like doctors, schools, people are already struggling to get appointments or school places, these are just two examples.

We are told these will be (affordable) houses but for who? These houses are not needed and will in no way benefit the local community.

There has been no thought gone into how all the extra traffic will further affect a already gridlock roads at certain times of the day. Our roads just can't cope.

I do hope my objections are taken into consideration before any planning for these houses get the go ahead.

Thank you.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H3

Reference **5197 Mr Marcus Hudson**

Lancashire County Council

Number of supporters:

Commenting on

H3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS2.64 - Vehicular access to Haslingden Old Road between 203 – 205 is unsuitable to accommodate the development traffic due to its narrow width and limited visibility splay onto Haslingden Old Road. The existing access between 191 – 193 is unsuitable for the same reasons

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H32

Reference **5192**

B&E Boys Ltd

Number of supporters:

Commenting on

Booth Road/ Woodland Mount, Stacksteads

H32

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. A previous consultation on the draft Local Plan(Regulation 18) was undertaken in summer 2017 in which Hourigan Connolly submitted representations in relation to the Booth Road/Woodland Mount site. This Representation is in relation to the Council's Publication Pre-Submission version of the Plan (Regulation 19). The consultation period ran from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses, as identified on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary.

Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation.

BACKGROUND

1.4 Hourigan Connolly is instructed to review and comment on the emerging Local Plan in relation to land at Booth Road/Woodland Mount, Stacksteads. The site has been allocated for housing in draft Policy HS2 under the Reference H32 for 10 dwellings.

1.5 The site is included in the SHLAA 2018 Update under reference SHLAA1609 which concludes that the site is available, suitable and achievable for housing with a calculated yield 10 units (based on 30 dwellings per hectare).

1.6 This Representation sets out that we support the site being allocated for housing under Policy HS2 but propose that the allocation is increased from 10 dwellings to 16 dwellings.

Figure 1.1 Location of subject site, Booth Road/Woodland Mount (circled in red).

1.7 The 0.3 ha site lies to the north of Booth Road in the northern part of the settlement of Stacksteads and comprises the garden land to the residential property known as Heath Hill House.

SCOPE

1.8 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

1.9 This document follows earlier Representations made by Hourigan Connolly as part of previous consultation stages in the Local Plan process.

OVERVIEW

1.10 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

1.11 The emerging Local Plan will be examined by an independent inspector whose role is to assess whether the plan is sound. We consider that the Plan is sound in relation to allocating the site for housing under H32 but propose that this allocation is increased to 16 dwellings.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

13 December 2018

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2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Councils such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The National Planning Policy Framework (hereafter referred to as the Framework) (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018, however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.¹ Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making. The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development. These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different

opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.
- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.
- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159), business (Paragraphs 160 – 161), infrastructure (Paragraph 162) and environment (Paragraphs 165 – 168).

HOUSING

2.21 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.22 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- “meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand”.

INFRASTRUCTURE

2.23 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.24 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.25 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.26 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.27 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report, in particular paragraph 030 (reference ID: 3-030-20140306 confirms):

“Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.28 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306):

“WHAT CONSTITUTES A ‘DELIVERABLE SITE’ IN THE CONTEXT OF HOUSING POLICY?”

Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.”

2.29 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that:

“HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?”

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.30 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.31 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which have been submitted or will be submitted before 31 March 2018.

2.32 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.33 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

2.34 Crucially the provision of the right type of housing in the right locations is considered to be relevant to this Representation.

3. POLICY HS2: HOUSING SITE ALLOCATIONS PROPOSALS MAP

3.1 The below image shows the site in the draft Proposals Map. The proposed housing allocation is annotated as H32 (orange hatching).

Figure 3.1 Extract from Draft Proposals Map

3.2 Policy HS2: Housing Site Allocations identifies all sites within the Borough which have been allocated for residential development. For each site allocated, site area, capacity, delivery timescales and the type of residential allocation is identified.

3.3 Land at Booth Road/Woodland Mount is identified as Housing Allocation Ref. H32 as shown below.

Figure 3.2 Extract from Site Allocations Table (Policy HS2)

3.4 We support the aims of the Local Plan to identify key development sites which are central to the delivery of the overall strategy for new housing.

3.5 The site is in single land ownership, being solely within the ownership of Mr Brian Boys. The allocation site is made up of private garden land which is bordered on all sides by trees and is located in the north of Stacksteads. To the north of the site is open countryside with the predominant surrounding land use being residential in nature.

3.6 There are no environmental or statutory designations or other technical considerations that would prejudice the residential development of the site. The site is sustainably located and is capable of delivering housing now.

SHLAA 2018 UPDATE

3.7 The site is identified in the SHLAA 2018 Update under the site reference SHLAA16098. The site assessment for the site can be found in Appendix 1. The SHLAA highlights that the site is located well to most local services. The site assessment concludes that the site is deliverable within the next 5 years and generates a yield of 10 dwellings. The site is available and deliverable and we therefore support the identified delivery timescale of 1-5 years. However we consider that the proposed number of units referred to (10 units) could be increased in this location as shown below.

ILLUSTRATIVE LAYOUT

3.8 The landowner has produced a layout in Appendix 2 (extract below) which demonstrates that 16 dwellings could comfortably be accommodated within the site. This would make more efficient use of the land and add further to the Council's housing needs.

Figure 3.3 Layout showing 16 dwellings at the Booth Road/Woodland Mount

SUGGESTED MODIFICATION

3.9 To ensure that this site delivers to its full potential it is suggested that the Council make a modification to the draft Policy HS2 (allocation reference H32) to simply allocate

the site for housing for up to 16 dwellings. This would be in accordance with Paragraph 47 of the Framework which requires Councils “significantly boost the supply of housing”.

4. CONCLUSIONS

4.1 The starting point for consideration of the Council’s draft Local Plan document is the well established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

4.2 We support the proposed housing allocation (H32) under Policy HS2, subject to increasing the number of units to 16.

4.3 Our client’s site is capable of being developed for residential purposes now.

Appendix 1 SHLAA 2018 Update Extract

Appendix 2 Illustrative Layout

Please see appendix

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H37

Reference **102 mr alan boon** - Number of supporters:

Commenting on chapter i policicy hs22 H37

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

with relation to the areas named my objections are the followingthere is loss of amenities in particular to arears H29 and H41 these arears are well used by all residents surrounding those areas they are used for dog exercising as required under the animal welfare act, these areas are used by local children keeping them of the busy estate streets.these areas are used by local residents for walking and relaxing.these areas are used by the many horse owners keeping them off the roads and are used as access routes to bridleways that surround Bacup loss of these trails will lead to horses being exposed to busy roads and inevitably will increase the danger therefore reducing the amount of young riders able to enjoy the bridleways.in particular H41 currently houses 3 areas of use area 1 is a purpose built football/basketball pitch. Area 2 is a children's playground area 3 is a gated garden area with benches whilst an area is to be allegedly prepared after this loss it is unlikely to accommodate all 3 and is not guaranteed to builtthe houses proposed will lead to a vast increase in density of housing giving an unacceptable increase in motor traffic with an inevitable increase in children playing in the roads the danger of serious accident is increases in an area that already has an issue with traffic.the infrastructure in which the proposed houses are situated is totally unsuited to an increase in houses, doctors and schools are currently operating to near capacity the proposed houses would give an approximate increase of 25% in need for these facility's.an increase of 25% traffic in such a small area could be considered dangerous in what is essentially currently a already busy estate the area of Bacup is scheduled to accommodate 25% of the total housing being built in Rossendale changing forever the landscape for the people of Bacup this is clearly disproportionate to the needs of Rossendale as a whole.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H39

Reference **114 Mr Ian Francis** - Number of supporters:

Commenting on All H39 H39

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

1. Legally Compliant. I am led to believe that the land in question is Common Land bequeathed to the people of Bacup for their enjoyment and recreational use by a benefactor in his will. As such I ask the Inspector to investigate into this matter as I believe that this Common Land cannot be allocated for or used for a housing development. 2. Soundness. I have read all documentation concerning the proposed development of the site named as Project H39 which is edge moorland and high meadow. One hundred and fifty one houses are proposed at a density of 25/ hectare, an enormous and oversized development on such a scenic and prized local amenity area. A. Every assessment concerning the following is graded as having a negative and mostly irreversible impact. a. the damage to the environment, b. irreversible damage to the visual amenity (change of appearance and character of an ancient landscape) of the area above Bacup, c. loss of important recreational use for locals and visitors (walkers, horse riders and hikers). d. loss of natural draining by absorption and the increased likelihood of the flooding risk in the valley, e. Loss of a valuable greenfield site. The only factors that score positively are those associated with the provision of housing, so there seems to be a commercially biased weighting being given to the building of houses at high amenity loss and other possible costs to a to e above. B. A factor not included as far as I can see is the health risk to potential house holders associated with the United Utilities mine water sedimentation site where Ferrous/ Ferric Oxides are harvested in settling areas. This fine, small particulate dust is taken on the wind and travels over the surrounding area in the direction of prevailing winds which will often travel over the proposed site H39. The proposed houses will be very close to this red oxide settling facility. Already further away, air borne red oxide dust is of sufficient concentration to discolour the walls of houses in Windermere Road, necessitating power washing to restore houses appearance to an acceptable state. Anyone living closer will be exposed to even higher concentrations of this small particle oxide dust. Recent and long established scientific studies have documented the dangers of inhaling small particulate dust and particles. People with compromised respiratory function or asthma would likely be at risk in this airborne oxide dust situation. As such, should the development be approved then the developer and Rossendale Council would have a duty of care to warn all potential purchasers or residents unless United Utilities completely stop the airborne oxide contamination. C. The plan consultation documents clearly state that school provision would be inadequate to support such a large population increase. I ask the inspector to ensure that full, costed plans are in place and with assured financing should the developments around Bacup take place. D. As described in the plan statements, the road system within and in all directions from Bacup are already inadequate. The system is constrained by the valley and habitations and towns along the valleys, making road development virtually impossible unless massive and frankly untenable amounts of finance are made available. The commuting time to anywhere outside of Bacup already makes it an unattractive place to live and commute from. Increasing the road traffic density as would happen with these developments would make living here untenable for many. E. The Health Care facilities will be overstretched if these developments take place. Already we have to wait as much as a week for a GP appointment and I am unaware of any further investment being made by the government or local Health Authorities to enlarge the GP services and facilities in Bacup. Also the time to get an ambulance to Bacup and to a hospital in an emergency is too long due to the issues in D above. Any further increase in traffic would make it worse and probably cost lives. The transit times during school run times and rush hour times would be extended beyond the already excessive times delays. F. The unemployment we have here would be further increased by these developments. The plan lists possible industrial and other sites for development that would offer employment. These are with respect putting hope before obvious history, current facts and national trends. There is no significant demand for new industrial or other types of employment generating initiatives in Bacup. Transport issues, logistics and position in the country do not encourage potential employers to move here. I would ask the inspector to ask for sustainable proof that fully costed feasibility studies have been undertaken to establish if viable and productive companies or industries are or would consider moving to the Bacup area. I fear that, as I said, G. There are no costed or defined plans recorded to alleviate or minimise the listed problems so we cannot comment on them. All we see in the plan are short "mitigating comments" of no substance and that loosely indicate intent. This is not acceptable to local residents who already are plagued by an inadequate infrastructure and are now expected to submit to further pressures, overpowering pressures on amenities and irreversible destruction of ancient landscapes that are now under threat at Project H39.

That project H39 is not progressed and alternative sites, preferably brownsites, are identified outside of the Bacup area. That detailed and guaranteed financed plans are in place to improve the road infrastructure to ensure travel times are not further increased, thereby making the area more attractive to potential residents and employers. That additional school facilities are in place and financed prior to any development commencing. That health care facilities are enhanced and fully funded to ensure the health of local residents is not compromised. That the iron oxide airborne contamination from the United Utilities sedimentation plant in Bacup is stopped by legally enforceable means. That fully costed, complete plans for the effective mitigation of the negative issues associated with housing site development on greenfield sites are presented and publicly discussed and approved prior to any development starting.

Do you wish to participate to the Examination In Public? **Yes**

Reasons I have just moved into the area and would by then have accumulated significantly more evidence to present.

Reference **5197 Mr Marcus Hudson**

Lancashire County Council

Number of supporters:

Commenting on

H39

Is the Local Plan legally compliant? **Did not answer**

Is the Local Plan sound? **Did not answer**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS 2:7 – Subject to more than one vehicular access onto the highway network being provided to distribute the traffic on the adjoining grid of terraced streets this site could be deemed acceptable. It would be necessary to use the football ground to provide one of the access points. Cowtoot Lane is too narrow to the east of the football ground boundary to accommodate any development traffic.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

H4; H5; H13; H17

Reference **19 Mr John Dawson** -

Number of supporters:

Commenting on -

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Letter received 05/10/2018:

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale

development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **No**

Reasons -

Reference **20 Mr Roger Fulton**

-

Number of supporters:

Commenting on -

Draft Local Plan

H4; H5; H13; H17

Is the Local Plan legally compliant? **Yes**

Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **No**

Loveclough - Crawshawbooth Area Duty to Cooperate - it had been previously agreed with residents and their representatives (LVRA) that development on the west of Burnley Road would be limited. Areas H4, H13 and H17 are all contrary to this undertaking. Unsound - The total of 179 house in area H,4,5,13 & 17 is excessive bearing in mind current infrastructures. The road network in the immediate area is already under strain and due to geography changes are impossible. Further down the valley geography again plays a part, as all roads are forced through the bottle neck at Rawtenstall and on to what has recently been highlighted as the busiest urban road in the country, heading for the busiest city outside London, Manchester. The total of 3000+ plus houses isn't going to improve this. Duty to Cooperate - has there been full in depth consultation with Highways England on this matter? I understand there are no plans to improve the M66/A56/A682. And the upgrading of the railway line to a passenger line is still only a dream with no money. Schools and healthcare provision are also under strain with no sign of money or time to get these in place before the houses are built. It seems obvious that once the land is re-designated in Loveclough/Crawshawbooth this will be the first to be built out, soon these need addressing as part of this plan

Infrastructure improvements must accompany or proceed the additional housing.

Do you wish to participate to the Examination In Public? **No**

Reasons -

Reference **29 Mrs EMMA Smurthwaite**

-

Number of supporters:

Commenting on Rossendale

H4 H5 H13 H17

H4; H5; H13; H17

Is the Local Plan legally compliant? **No**

Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **No**

Failure to consult on these proposals It conflicts with a core strategy protecting countryside

There needs to be just and proper consultations with residents

Do you wish to participate to the Examination In Public? **Yes**

Reasons -

Reference **44 Mr Ian Boucher** - Number of supporters:

Commenting on - H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

With consideration to H4 Turton Hollow Goodshaw (30 houses)H5 Swinshaw Hall, Loveclough (47 houses)H13 Loveclough WMC and land at rear (95 houses) H17 Land south of Goodshaw Road (7 houses)What is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy from 2011 which ahs the support of the local population. In particular there would be no new building to the west or Burnley Road. The sites H13 and H17 are designated countryside. The impact of some many house on such a small are will destroy country amenities and the country side itself. The council have not considered the wider impact on wildlife and the environment. Such destruction can only lead to further speculative applications and further degradation of the area in the future.

Rossendale Borough Council must refer to their own Core Strategy agreed on supported by the locallyThey must consider and the impact on local environmental amenities, the environment and wildlife and whether allowing such development will only encourage

Do you wish to participate to the Examination In Public? **Yes** Reasons Local voices must be heard.

Reference **44 Mr Ian Boucher** - Number of supporters:

Commenting on - H4; H5; H13; H17

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

With reference to the following:H4 Turton Hollow Goodshaw (30 houses)H5 Swinshaw Hall, Loveclough (47 houses)H13 Loveclough WMC and land at rear (95 houses) H17 Land south of Goodshaw Road (7 houses)RBC have not taken into account the excessive pressure that building so many properties in a small area will have on infrastructure in the local area.In particular there is very limited public transport locally and in the wider Rawtenstall area. There are no train or tram links to the South and Manchester. The main road, Burnley Road is already heavily congested and to the South Rawtenstall centre, the only link the heavily congested M66, has been named the heaviest traffic congested area outside of London. Plus there are no plans to improve public transport or the road network. An office of RBC has already said that "solving Rossendale's traffic problems is impossible", so adding extra road traffic that can only come from the proposed properties will only add to the problem.To the North traffic can be very heavy trying to get to the M65.The is a single primary school in the area which is full with no plans to increase its size. Any family will be using a to travel to school adding further to the traffic woes. Current residents are already aware of the pressures on the sewage system and new houses will only add to this. There are no plans to upgrade the system.

Any sound plan will have to take note of poor public transport links, school provisions and the inadequate sewage structure.

Do you wish to participate to the Examination In Public? **Yes** Reasons To ensure local voices are heard.

Reference **44 Mr Ian Boucher** - Number of supporters:
Commenting on - - H4; H5; H13; H17
Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

In reference to:H4 Turton Hollow Goodshaw (30 houses)H5 Swinshaw Hall, Loveclough (47 houses)H13 Loveclough WMC and land at rear (95 houses) H17 Land south of Goodshaw Road (7 houses)RBC only presented the plans locally in the middle of September giving very little time for locals to respond by 5th of October. Locals have been able to comment with no provision to make changes making the process slightly farcical as the plans are fait accompli with no room the make changes.

Rossendale Borough council must allow more feedback and listen to the locals and be willing to make changes.

Do you wish to participate to the Examination In Public? **Yes** Reasons Local voices must be heard.

Reference **56 Mr Stephen Lloyd** - Number of supporters:
Commenting on - - H4; H5; H13; H17
Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

I can't comment on the entire plan so will only comment on the area I know - that around were I live. This involves four sites, H4 Turton Hollow; H5 Swinshaw Hall, Loveclough; H13 Loveclough WMC and land at rear; and H17, land south of Goodshawfold Road. There is one road going through this area - the A682. The road is already heavily congested, particularly entering Rawtenstall. A recent report has already highlighted Rossendale having the worst congestion issues anywhere in the country excluding cities. The Council have just started the wheels in motion in terms of looking at the road situation but admitted that, if anything is done then it will likely not be until 2024 at the earliest. There is no taking in account of amenities in the area. The local primary school, in Crawshawbooth, is already full. You can't get an appointment at the local doctors and similarly, the dentists are stretched (I travel in to Manchester to visit a dentist) I do not know what is classified as 'unsound' when you look at a plan of this sort but surely a plan which does not take in to account issues of whether the local road infrastructure will be able to cope with the increased number of cars on the road; does not take in to account whether their is enough doctor and dentist services; and does not take in to account whether there will be enough spare capacity at the local schools can not be classified as a 'sound', well thought out, plan. It's developers looking to make a quick buck building houses in an area they know will sell well to the detrimental effect on the existing residents in the area. If houses are needed (and I've not seen any obvious evidence of a shortage of property in the area - there are actually 1400+ empty properties in Rossendale in need to renovation which could be turned in to good quality affordable housing stock) then build the infrastructure first, then the houses. How can it be a sound plan to do it the other way around?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons -

Reference	80 Mr	Stephen	Marlow	Number of supporters:
Commenting on	-	Yes		H4; H5; H13; H17
Is the Local Plan legally compliant?	No		Is the Local Plan sound? No	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs

Re: Rossendale draft local plan proposals, Regulation 19 consultation I appreciate that this, the publication (regulation 19) stage of the evolving Local Plan, residents ability to respond is constrained somewhat by three criteria Soundness, Legal and duty to Cooperate. On Soundness there has been a manifest failure to consult those residents most affected by the last minute additions for that is what they are to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites) having a knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have on regards at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last ditch proposals? As RBC has failed previously to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. they are as follows H4 Turton Hollow Goodshaw (30 houses), H5 Swinshaw Hall Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses), H17 Land south of Goodshawfold Rs (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds. Whilst I am fully aware of Rossendale Borough Councils commitment to having to provide 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is wholly inappropriate, excessive and to existing residents and Council Tax payers unacceptable. First, what is proposed conflicts with RBC's previously adopted core strategy arrived at in 2011 after consulting residents representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new development west of Burnley road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13 and H17 a total of 102 houses would be a complete U-turn on this undertaking and frankly a betrayal of residents. Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will inevitably encourage more speculative applications in the future. Furthermore locating a large development at H15 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised. Thirdly, the current road network simply cannot support the additional volume of traffic. The A682 Burnley road is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly traveling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11 70 houses) and Reedsholme Works (H12 100 houses). Furthermore the geography of the area prevents any possible upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +/- 700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that solving Rossendale's traffic problems is impossible. Fourthly, the local primary school is already full and there are no published plans for its expansion to accommodate an estimated

additional +/-300 pupils, a situation I am very aware of as my granddaughter cannot get a place at the school after moving to the area from Rochdale leaving us with two, two hour round trips a day to take her and collect her from her present school. Should the school be enlarged it would become of an educationally unacceptable size as a result of having to almost double in size. Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under

pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 new residents needs to be catered for. Finally, interest shown in acquiring land in the vicinity of Loveclough has high. Once permission has been granted for the western sites RBC is certain to be inundated with further applications to build

on land from Boundary Garage to Crawshawbooth, the area being more attractive to developer's than most other area's in Rossendale. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing application's and thus allowing wholesale development in an area of considerable natural beauty. I urge Rossendale Borough Council to take all the above into account when reaching their final decision on housing land availability and take steps to prevent what would almost certainly be a development and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons -

Reference **90 Mrs Ann-Marie Barnes** Number of supporters:

Commenting on - - H4; H5; H13; H17

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

I feel that the plan is unsound. I live in the Crawshawbooth area and so refer to the plans for the area around where I live - H4 Turton Hollow, H5 Swinshaw Hall. Loveclough, H13 Loveclough WMC and land at rear, and H17 land south of Goodshawfold Road. Having read the local plan Highway Capacity Study I am astounded at the conclusion that "in the first five years of the plan growth can be accommodated on the existing highway network without any physical intervention and that no interventions are therefore required prior to or at 2024". I was also really surprised to see that a proposed housing plan of such magnitude which is going to negatively affect the quality of life of so many people only considered taking traffic statistics from one Thursday in October 2017 - which was only a few weeks after new stores on New Hall Hey retail park opened and therefore the impact of this couldn't have been reflected. I notice a recent BBC article which comments on rush hour as running between 06:00am - 09:00am and 16:00pm - 19:00pm weekdays. Surely a longer sample - over more than one day and more hours should have been taken as a useful "highway capacity study"? I would also like to query the soundness of the plan as no explanation has ever been given to local residents regarding the number of people in Rossendale who actually require housing. Obviously residents who live here should be able to continue to live in the area - whether that be renting or buying property, but we have been given no indication of the numbers of people, which leads me to the conclusion that these houses are only being built as a result of government insisting that so many houses be built. Has local demand ever been calculated? Would local first time buyers ever be able to afford these houses? If the local average wage is 19,000 pounds in Rossendale then I suspect that they won't be able to buy a first house in this area. Or are these houses going to be built in beautiful green field sites to form a long corridor of commuter belt - increasing the congestion on roads? Loveclough, Crawshawbooth, Goodshaw are small villages/hamlets with no capacity for this extra housing. I do not believe that infrastructure should come second to lining developers pockets. Only when local demand for the housing is identified, highways are improved, and the impact on doctors, dentists and schools is identified and solutions to these put forward should a housing plan be possibly put forward. I currently have to wait 2 weeks for a doctors appointment as the surgery is under so much pressure, and as there is no longer an A & E at Burnley Hospital how much more pressure will all this extra housing put on NHS services? I did not grow up in this area - in fact I have only recently moved to this area. I gave up a job so that I could live in beautiful Crawshawbooth and I found work locally. Every day when I walk down Goodshaw Lane I cannot believe how beautiful the views are and tell myself how lucky we are. This scenery in this area should be treated as a jewel in Rossendale's crown. You are going to change a close knit community who chose to live in a village for that very reason (the peace and quiet with very little access to a city centre) forever. I feel that this plan is not only unsound on transport and infrastructure issues, but is also morally unsound - taking away from people their reasons for living where they do, and affecting quality of life which cannot be measure by global Consultancy Companies.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	100 Mr	Andrew	Holt	-	Number of supporters:
Commenting on	-	-			H4; H5; H13; H17
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Yes

I am not qualified to comment on points 1 and 3 above so have not done so. My particular issues are with the proposed development in the Loveclough/Crawshawbooth area and in summary are:- As a commuter to Manchester I am already regularly sat in huge delays and traffic jams in Rawtenstall - the roads simply can not cope at rush hour with significant additional traffic that this development would bring.- The local primary school is already full and people in Loveclough already can not get their children in there - I do not want my child to have to attend an overcrowded school/school several miles away.- Crawshawbooth already regularly floods - the stream at the bottom of my street regularly rises and creates a huge and unsafe lake on the main road - with the proposed field that absorbs much of this water to be covered in tarmac and concrete the problem will undoubtedly get worse and many more homes will be flooded out in coming years.- My home is part of a 17th century farm house - it has looked out on green fields for over 200 years, Swinshaw Hall similarly - we will now have a housing estate for a view not to mention 5, 10, 15 years of unsightly and noisy construction work to look forward to.

Received 05/10/18:

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and

Reference	117 Mrs	Gwen	Marlow	-	Number of supporters:
Commenting on	-		Yes		H4; H5; H13; H17
Is the Local Plan legally compliant?	No		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs Re: Rossendale draft local plan proposals, Regulation 19 consultation I appreciate that this, the publication (regulation 19) stage of the evolving Local Plan, residents ability to respond is constrained somewhat by three criteria Soundness, Legal and duty to Cooperate. On Soundness there has been a manifest failure to consult those residents most affected by the last minute additions for that is what they are to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites) having a knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have on regards at all demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last ditch proposals? As RBC has failed previously to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. they are as follows H4 Turton Hollow Goodshaw (30 houses), H5 Swinshaw Hall Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses), H17 Land south of Goodshawfold Rs (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds. Whilst I am fully aware of Rossendale Borough Councils commitment to having to provide 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is wholly inappropriate, excessive ill advised and to existing residents and Council Tax payers unacceptable. First, what is proposed conflicts with RBC's previously adopted core strategy arrived at in 2011 after consulting residents representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new development west of Burnley road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13 and H17 a total of 102 houses would be a complete U-turn on this undertaking and frankly a betrayal of residents. Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will inevitably encourage more speculative applications in the future. Furthermore locating a large development at H15 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised. Thirdly, the current road network simply cannot support the additional volume of traffic. The A682 Burnley road is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly traveling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11 70 houses) and Reedsholme Works (H12 100 houses). Furthermore the geography of the area prevents any possible upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +/- 700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that solving Rossendale's traffic problems is impossible. Fourthly, the local primary school is already full and there are no published plans for its expansion to accommodate an estimated additional +/- 300 pupils, a situation I am very aware of as my granddaughter cannot get a place at the school after moving to the area from Rochdale leaving us with two, two hour round trips a day to take her and collect her from her present school. Should the school be enlarged it would become of an educationally unacceptable size as a result of having to almost double in size. Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 new residents needs to be catered for. Finally, interest shown in acquiring land in the vicinity of Loveclough has high. Once permission has been granted for the western sites RBC is certain to be inundated with further applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developer's than most other areas in Rossendale. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty. I urge Rossendale Borough Council to take all the above into account when reaching their final decision on housing land availability and take steps to prevent what would almost certainly be a development and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

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Do you wish to participate to the Examination In Public? **No**

Reasons -

Reference	5001	Alistair	Shottin	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5002	Andrew	Bennett	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5003** **Andy** **Harrison** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5004	Ann	Adams	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5005**

Anthony

Craig

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5006**

Barbara and Jack Rose

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5007** **Barbara** **St John** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5009** **Craig** **Scott** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5010	Denise	Harrison	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5012 Ms	Alice	Marsden	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5013 Ms** **Amanda** **Marshall** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5014**

Barbara Howorth Steve Howorth

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5021 Mr & Mrs	Bernard	Sheila Timperley	Number of supporters:
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Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5023 Ms & Mr Claire Matthew Shaun Stott**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5024 Mr	Craig	Adams	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5025 Mr Damien Warburton** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5026 Mr & Mrs	David Ainsworth	Susan Ainsworth	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan comply with the duty to co-operate?	Did not answer
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I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5027 Mr	David	Rhodes	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (7 houses); 7 Land adjacent to Laburnum Cottages I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds. Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable. First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. . Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size. Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for. Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty. I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5. Restricted access to site H7 – Increase in traffic not accessible</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5028 Ms**

Debra

Booth

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5029 Ms**

Eileen

Curry

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5031 Ms**

Eleanor

Cliffe

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5033 Dr**

Catherine

Williamson

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons	
Reference	5035 Mr Eric Walton		Number of supporters:
Commenting on	HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer
		Does the Local Plan complies with the duty to co-operate?	Did not answer

Dear Sir/madam

Re your plan for extra housing in Loveclough, the developers will only be interested in profits building four bedroom detached houses for city people who want to live in the country and when they get here they don't like it so try to urbanise the area.

The need is for affordable housing so the villages can stay where their families and friends are, if you are serious about affordable housing to save space and cheaper houses build terraces, they will blend into the landscape, you haven't noted where you will build the new school , doctors surgery's and room to expand or replace the sewerage works, all essential, no vital to expansion, that's providing the sewers are big enough to cope.

Another point is how many houses will be demolished on Burnley Road to make it a dual - carriageway, there are enough problems now so with all the extra vehicles planned it will be gridlocked and a lot of people late or missed work.

A nice thought would be a communal room for youth clubs etc. for the children as there is nothing interesting for them to do after school, evenings and weekends.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference	5038 Mr	Glen	Little	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5039 Mr	Guy	Thomas	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5040 Ms** **Helen** **Casey** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5041 Ms Hilary Elizabeth Myers** Number of supporters:

Commenting on **HS2** **H4; H5; H13; H17**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5042 Mr Ian Meller** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5043 Mr	Jack	Rose	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17

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Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5044 Mr & Mrs	James & Sheila	Byrne		Number of supporters:
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Commenting on	HS2			H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale

development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5045 Mr	James	Bridge	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>Dear Sirs,</p> <p>Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (7 house)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds. Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer		Reasons	

Reference **5046 Mr James Taylor**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on

medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5047 Mr**

Jean

Bostock

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5048 Mr**

J. M.

Ollerenshaw

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5049 Mr John Clements**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5050 Ms**

Karen

Bower

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5051 Mr**

Karl

Crompton

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference **5052 Mr Kenneth Lambert**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **No**

Is the Local Plan sound? **Did not answer**

Does the Local Plan comply with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5053 Ms**

Laura

Carter

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5054 Ms Margaret Ashworth** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5055 Ms	Lynn	Weir	Number of supporters:
Commenting on			HS2	H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5057 Ms	Mary	Whittaker	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference	5058 Ms	Maureen	Turner	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5059 Mr & Mrs	Howarth	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5061 Mr & Mrs	Adrian Hurley	Laura Hurley	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5062 Mr & Mrs	Anne Leaf	John Leaf	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5063 Mr & Mrs	Lynda Nuttall	Mark Nuttall	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5065 Mr & Mrs	S. A.	Hargreaves	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5066 Mr & Mrs	Winnard	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17	
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer
		Does the Local Plan complies with the duty to co-operate?	Did not answer

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Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale

development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5067	Richard Holt	Michele Holt	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5068 Mr & Anthony O'Malley Carole O'Malley Mrs**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5069 Mr**

J. D.

Pilling

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5070 Mr James Hargreaves**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference **5071 Mr & Miss** **Jon Stokes** **Emma Walker**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5072 Mr**

Julian

Ashworth

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.
P.S. I cannot support a schem that will result in Rossendale becoming more and more "Choked" with traffic and associated fumes.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5073 Mr**

Michael

Kurtianyk

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

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I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference	5074 Mr	M	Hugo	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5075 Mr Michael Webster** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5076 Mr Peter John Harper** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5077 Mr Samuel Whittaker** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5078 Mr	Trevor	Harden	Number of supporters:
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Commenting on	HS2	H4; H5; H13; H17
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5079 Mrs	B	Ashworth	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5080 Mrs	Eluned	Trickett	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.
I agree totally with the above. The road, the village, school, cannot in my opinion sustain more housing.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5081 Mrs Julie Harden	Number of supporters:
Commenting on	HS2	H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5082 Mrs	M. L.	Stott	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5083 Mrs Marian Bent** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5084 Mrs Sandra Lawson	Number of supporters:
Commenting on	HS2	H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference	5085 Ms	Shelley	Kurtianyk	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>Dear Sirs,</p> <p>Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds. Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5086 Mr**

Neil

Prestwich

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5087 Ms**

Patricia

Richardson

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5088 Ms**

Nicola

Bamford

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5089**

Paul Meller

Kate Farmer

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5090 Ms**

Pauline

Lord

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5091 Mr Peter Simpson**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5092**

S.

Taylor

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5093 Ms**

Sally

Stansfield

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Dear Sirs

I whole-heartedly agree with all the content of the carefully prepared response regarding the proposals to develop land around Crawshawbooth and Loveclough. To contemplate any further development in this area is quite frankly absurd on any level.

Traffic Congestion

Only in the Free Press last week it was highlighted that Rossendale is one of the worst areas for traffic congestion. This is particularly evident along Burnley Road through to Rawtenstall and development will exacerbate an already serious problem. For residents who live on the main road and have to reverse into out of driveways the addition of streams on traffic down this route will make this task more dangerous than it already is. Burnley Road is one direct route with no option to alter the route or expand traffic lanes and the proposals will make this route at times impassable.

Amenity

Crawshawbooth and Loveclough are historic areas that encompass conservation areas. To further develop the green land that remains will totally destroy the community and village base. The whole landscape will be ruined.

Education

My family have historic connections with Crawshawbooth and Loveclough for centuries. I have three young children and one of the considerations when I moved to the area from Rawtenstall 116 years ago was the school; a village school with a sense of community spirit and a safe, secure site with manageable class sizes. The proposals totally fail to address the education needs of the area and demand on what is already an oversubscribed and popular school. Speaking as a parent of two children who currently attend the school, the size is already bursting at the seams. There is no room to accommodate larger classes. To expand would be to the detriment of the outdoor playing and recreation areas and fundamentally to the quality of the teaching and school environment upon which it prides itself. Has consultation taken place with schools in Burnley to see if they can accommodate

the increased numbers in school aged children?

Furthermore, one problem that cannot be improved by any plans is the parking and drop off area for the school. In the mornings and evenings, given the location of the school in a residential area with

double yellow lines down the main road, the parking options are limited. The school have had to engage local police to deal with offenders who park on double yellow lines due to safety concerns of

their pupils. Has consultation taken place with the police and education authorities to discuss the impact of the proposals on the safety of young children in the area?

Medical Services

The GP and dental services in this area are already under pressure and limited in the service they can offer. The proposed developments will compound this problem.

Further Applications

This is a serious concern. The area opposite my house has attracted interest in the past and no doubt such applications will be raised again if the proposed developments go ahead. There is a risk the whole of Burnley Road will become built up and the impact upon the community, the infrastructure and the history of the area will be destroyed.

The residents of Crawshawbooth and Loveclough and beyond are in disbelief that the Council think the proposals (which are last minute and upon which there has been a failure to consult) are acceptable, workable and justified.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5094**

Stephen Felinski **Sally Felinski**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5095 Ms**

Sharon

Coulton

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5096 Ms**

Sheila

Newton

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5097 Mr**

Stephen

Rae

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5098 Mr**

Steve

Martin

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5099 Mr Steven Hodgkinson**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5100 Ms**

Sue

Shadlock

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5102 Mr**

Wayne

Tomkinson

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5114 Mr**

E

Taylor

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Re: Rossendale Draft Local Plan Proposals. Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 Houses), H5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses), H17 Land south of Goodshawfold Road

(7 Houses)

I wish to register my objection to the Local Plan proposals, on the following grounds.

The proposal for land availability in Goodshaw Ward as stated above is ill advised, wholly inappropriate, and unacceptable to existing residents and tax payers, of which I am one. In 2011 after consultation with resident's representatives, Rossendale Borough Council adopted a core strategy. This included an undertaking that there would be no new developments west of the Burnley road (A682) in this area. Two government inspectors have supported this undertaking, in 2015 and 2017. Furthermore, the proposed developments lie outside the council's current urban boundary. Approval of H13 and H17 (102 houses) would be a U-Turn by the council on this undertaking, and show complete disregard for residents.

The number of properties proposed in areas H4, H5, H13 and H17 (179 Houses) is excessive and will have the effect of destroying amenity. If this development is allowed to go ahead, it will encourage a volume of speculative applications in the future. In my opinion the sites in question, have been chosen for their desirability due to being designated countryside.

There is only one main road through this area and currently it struggles with the volume of traffic. The A682 links Burnley with Rawtenstall, but it is also the only link to the M66 motorway, which many people use to travel to work and business in Manchester. This causes a jam involving 700+ vehicles in Rawtenstall every day. The proposals suggest that an additional 360 vehicles will use this road daily travelling towards Rawtenstall. In addition it is estimated that we can expect a further 360 vehicles, from the proposed new housing at The Hotlins (H11, 70 houses) and Reedsholme Works (H12, 100 houses), using the same road.

There is no opportunity to upgrade the A682 due to its geography, and this increased traffic will have negative environmental and safety implications for all those in the area. The local primary school is already oversubscribed. There are currently no plans to expand the school, and if there were, it would need to almost double in size, to cater for an estimated additional 400 pupils, if this proposal goes ahead. That would render it educationally unacceptable.

The provision for medical and dental treatment in the area is already at saturation point. The proposal would see an estimated extra 800 residents, vying for treatment from already overburdened facilities. Even if the medical surgery could expand, it already struggles to attract suitably qualified GP's to work there, and this will not change in the foreseeable future.

This particular valley is regarded as the most desirable and as such is in my opinion taking its unfair share of new housing developments in the valley. If any of these houses go ahead, then developers will queue up to buy undeveloped land between the houses to fill in between them. If permission was granted the council would struggle to give grounds for refusing future applications, and thus allowing wholesale development in the area. As a result, the rural nature of Loveclough will be destroyed by ribbon development along the route of the A682, thus perversely ruining the very reason why the area is desirable.

There is also the question of who will buy these houses, as a landlord, I talk to local estate agents and they all say that it is mainly Mancunians taking advantage of high house prices in the city and moving out to cheaper areas like Rossendale. This is going to lead to Rossendale just being a commuter belt for Manchester rather than an independent area.

I am aware that like all councils Rossendale Borough Council are under pressure to provide more housing to satisfy government promises. However, the Office of National Statistics regarding housing needs over the next 25 years, now show a considerable dip in the previous forecast in 2014. Some areas of the country show a minus requirement, yet these councils are still making a local plan. This just proves it is not feasible to only focus on national numbers. Currently there are many housing units for sale or rent in

Rossendale as a whole, careful consideration should be made by the council as to whether anymore are actually required.

I urge Rossendale Borough Council to take into account all the above when making a final decision on housing land availability. Goodshaw Ward does not need additional housing.

Yours faithfully,
Mr E Taylor

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5115 Ms Sarah Boustouller** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Good Morning

I would like to formally lodge my objection to the 95 houses proposed at the top club and land at the rear as well as the 47 houses at swinshaw hall, 7 goodshawfold and 30 at turton hollow.

There are insufficient amenities in the local area eg schools, drs to support these homes as well as car parking in crawshawbooth.

Kind regards
Sarah Boustouller

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5123 Mr Peter Stansfield** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The purpose of this email is to add my comments to those of other residents and organisations in respect of the Local Plan which is shortly to be submitted by Rossendale Borough Council (RBC). I appreciate that at this stage, resident's ability to comment is constrained by the 3 criteria of Soundness; Legality and Duty to Co-operate, but given the late additions to the plan I feel justified in asking that these comments be considered.

Local residents have had virtually no consultation from RBC on the inclusion of 4 new sites for additional housing in the Loveclough area, and were it not for the local residents association I would have known nothing of these plans.

Given this lack of consultation I feel justified in making these comments with respect to the 4 new sites, H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 land to the rear of Loveclough WMC(95 houses; H17 land south of Goodshaw Fold Road (7 houses). As a resident who knows the area well I would like to raise my objections for the following reasons.

I appreciate that RBC has an obligation to include for the building of over 3000 houses in this latest plan, something which in itself is totally unrealistic and unacceptable, but the inclusion of the sites already listed is inappropriate and ill advised.

There are a number of reasons for this. Firstly, RBC have previously adopted a core strategy which was arrived at in 2011, after consultation with local residents associations which was that there would be no new developments to the west of Burnley Road (A682). Three of the sites which have now been included in the plan are in direct contradiction with this agreement. These sites are designated as countryside and lie outside the council's current urban boundary and two planning inspectors have recently upheld this view, in 2015 and 2017. For RBC to now undertake a U-turn on this agreement, simply to fulfil a formula driven requirement, is unjustified and unsound.

Secondly the impact of such a large number of houses on the current infrastructure of the local area will be profound. The local road network is already at breaking point, as anyone who tries to travel through Rawtenstall, at any time, not just peak times, will testify. There are already developments in the pipeline which will add to the strain on the network, so the addition of a further 300+ vehicles from these proposals will be damaging to the environment, safety, and to productivity, as people spend longer sat in their cars in traffic congestion. I believe RBC has recently received a report that suggests that by 2024 the traffic problems in Rawtenstall are likely to result in gridlock. This will only be exacerbated by these proposals. Whilst there are public transport links to other locations, particularly Manchester, there is limited parking for people wishing to use this, which creates greater pressure for residents as people use roadside parking as their only alternative. The fact that the local area is a valley means that solutions to improve traffic flow cannot include road widening or additional road building because of the topography of the area, so solutions will not be easy to find. It also means that snowy weather can bring severe traffic disruption as existing residents from local developments cannot get back to their homes, so adding to the roadside parking problems.

Other elements of local infrastructure which will be adversely impacted will include the local education and health amenities. The local primary school is already full and whilst I understand developers will need to make a contribution to the education budget, I suspect this will in no way reflect the true cost of accommodating so many additional pupils, in terms of physical infrastructure and additional staff, and will take no account of the impact on the size the school will become and how that will impact the children. There is already a significant safety risk at the beginning and end of the school day, as parents park to drop off children, and this will clearly be worse with such additional numbers. There will be a similar impact on health and dental services as the new residents seek to join an already strained service.

I believe that there will be a requirement for a % of the new houses to be deemed "affordable" and that this test will be based upon an average of local wages. I understand

however that this is only 30% of the total so the likelihood is that 70% will be taken by people not currently resident in the borough. This will negate any arguments that the number of houses will not lead to a corresponding increase in the local population, and all the demands they will make.

I would also like to make a couple of comments regarding the individual sites themselves. Firstly the area proposed for H13 may well pose a flood risk as this land is a catchment for water feeding down into the river. If this were to become a "hard" surface, where would all this water drain to and what would be the impact upon existing housing. Secondly the large development at H5 surrounds the historic building of Swinshaw Hall, the setting of which would be seriously affected.

I understand there is already considerable interest from developers in these sites. If the go-ahead is given and these sites are included in the plan, it is likely that their inclusion would set a precedent which it would be difficult to resist for future applications. I anticipate that developers would see the Loveclough area of Rossendale as a much more attractive proposition than many other parts of the Borough and therefore, if approval is given for these sites to the west of Burnley Road, there would be many more applications coming forward, and pretty soon even more of our countryside would be lost.

Finally, at the local residents meeting on 10 September, Councillor Barnes suggested there are already in excess of 1000 empty houses in the Borough. Whatever the reason for this, surely they should be brought into use, or at least included in this plan, to minimise the impact of additional development, and make best use of existing resources.

I would ask that RBC take all these issues into account when finalising the 15 year plan and that they remove the sites identified above to avoid the myriad of problems which their inclusion would bring.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5125 Mrs	W	Taylor	Number of supporters:
Commenting on			HS2	H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 Houses), H5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses), H17 Land south of Goodshawfold Road(7 Houses) I wish to register my objection to the Local Plan proposals, on the following grounds. The proposal for land availability in Goodshaw Ward as stated above is ill advised, wholly inappropriate, and unacceptable to existing residents and tax payers, of which I am one. In 2011 after consultation with resident’s representatives, Rossendale Borough Council adopted a core strategy. This included an undertaking that there would be no new developments west of the Burnley road (A682) in this area. Two government inspectors have supported this undertaking, in 2015 and 2017. Furthermore, the proposed developments lie outside the council's current urban boundary. Approval of H13 and H17 (102 houses) would be a U-Turn by the council on this undertaking, and show complete disregard for residents. The number of properties proposed in areas H4, H5, H13 and H17 (179 Houses) is excessive and will have the effect of destroying amenity. If this development is allowed to go ahead, it will encourage a volume of speculative applications in the future. In my opinion the sites in question, have been chosen for their desirability due to being designated countryside. There is only one main road through this area and currently it struggles with the volume of traffic. The A682 links Burnley with Rawtenstall, but it is also the only link to the M66motorway, which many people use to travel to work and business in Manchester. This causes a jam involving 700+ vehicles in Rawtenstall every day. The proposals suggest that an additional 360 vehicles will use this road daily travelling towards Rawtenstall. In addition it is estimated that we can expect a further 360 vehicles, from the proposed new housing at The Hotlins (H11, 70 houses) and Reedsholme Works (H12, 100 houses), using the same road. There is no opportunity to upgrade the A682 due to its geography, and this increased traffic will have negative environmental and safety implications for all those in the area. The local primary school is already oversubscribed. There are currently no plans to expand the school, and if there were, it would need to almost double in size, to cater for an estimated additional 400 pupils, if this proposal goes ahead. That would render it educationally unacceptable. The provision for medical and dental treatment in the area is already at saturation point. The proposal would see an estimated extra 800 residents, vying for treatment from already overburdened facilities. Even if the medical surgery could expand, it already struggles to attract suitably qualified GP's to work there, and this will not change in the foreseeable future. This particular valley is regarded as the most desirable and as such is in my opinion taking its unfair share of new housing developments in the valley. If any of these houses go ahead, then developers will queue up to buy undeveloped land between the houses to fill in between them. If permission was granted the council would struggle to give grounds for refusing future applications, and thus allowing wholesale development in the area. As a result, the rural nature of Loveclough will be destroyed by ribbon development along the route of the A682, thus perversely ruining the very reason why the area is desirable. There is also the question of who will buy these houses, as a landlord, I talk to local estate agents and they all say that it is mainly Mancunians taking advantage of high house prices in the city and moving out to cheaper areas like Rossendale. This is going to lead to Rossendale just being a commuter belt for Manchester rather than an independent area. I am aware that like all councils Rossendale Borough Council are under pressure to provide more housing to satisfy government promises. However, the Office of National Statistics regarding housing needs over the next 25 years, now show a considerable dip in the previous forecast in 2014. Some areas of the country show a minus requirement, yet these councils are still making a local plan. This just proves it is not feasible to only focus on national numbers. Currently there are many housing units for sale or rent in Rossendale as a whole, careful consideration should be made by the council as to whether anymore are actually required. I urge Rossendale Borough Council to take into account all the above when making a final decision on housing land availability. Goodshaw Ward does not need additional</p>				

housing.
Yours faithfully,
Mrs W Taylor

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5138 Ms Jayne Hadley** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5149 Mr**

Rex

Trippier

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

I lived in Crawshawbooth for over 40 years, 30 of them at 16 Turton Hollow and I also attend St. Mary' Church, Goodshaw, so I am fully aware of the impact of house building on the site involved. I also have two grandchildren at Crawshawbooth Primary School and am concerned at the disruption to their education resulting from a hugely enhanced intake. Finally, the enhanced volume of traffic on Burnley Road would cause gridlock in Rawtenstall, already the most congested town in the country.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5165 Ms** **Annie** **Green** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5183**

Kathryn

Bland

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Second letter:

I strongly oppose the proposals for housing to be built in the sites listed in the attached letter for all the reasons stated.

I am particularly concerned about the proposal of 30 houses to be built on site H4, Turton Hollow Goodshaw.

As a resident and home owner of X Edward street for the last 18 years this would be highly unacceptable.

The access on Edward St for residents alone it at its maximum and is barely able to cope with the additional traffic created by school drop off and pick ups by parents. There is no adequate parking for the school and thus Edward St and adjacent streets as well as Burnley Rd itself gets very congested making it difficult and dangerous entering and exiting the street at this time. Additional housing will only add to this already dangerous situation which could lead in the safety of school children being very much at risk.

On a personal note, which I know is not regarded as important but one I feel should be, when you buy a house to live in you choose it by certain criteria, it's a big decision and one you know will affect your quality of life and well being.

I chose where I live for the peace and tranquillity and beauty of the area but with good local amenities and links to Manchester.

I have witnessed pt hand the changes in traffic on Burnley Rd as more housing has been built over the ears and how easily it can build up with traffic with just the smallest of hold ups.

I have seen Crawshawbooth school expand and increase its size to accommodate more children and lose less of its outdoor space and places becoming unavailable.

It has got harder to get an appointment at the doctors etc and all this will just get worse if the proposed plans go ahead.

I and my family enjoy walking in the vicinity if our house and my children have room to play and explore in a safe environment, which again will be seriously affected by the proposed plan, it brought my 12yr old daughter to tears.

If I wanted to live on an estate of houses with no view of the countryside just looking into peoples homes I would have bought said house on an estate. I did not and I don't see why I should be subjected to living in front of one in the possible future.

I really do hope RBC take into account all information stated in these two letters and take steps to prevent proposed plans taking place as they would have a huge impact on existing residents both environmentally and their quality of life.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5203 Mr	Mark	Cutting	Number of supporters:
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Commenting on		HS2	H4; H5; H13; H17	
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5216 Mrs J Mulvee	Number of supporters:
Commenting on	HS2	H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5223**

Patricia

Wood

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5236 Alice Fox**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5237	Andrea	French	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5238**

Allan J.

Howarth

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5239 Mr Andrew Mark Howarth** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5240**

A. Jane & GJ

Nicholson

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5241** **Alan & Jean** **Ludlow** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5242	Alex & Sarah	Buckley	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>Dear Sirs,</p> <p>Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds. Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5243**

Alex

Keymer

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5245**

Brenda

Armitage

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5246**

Barbara

Askew

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5247**

B

Connolly

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5248 Mr**

Brian

Fox

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5249**

Barbara

Greer

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5250**

Ben

Murphy

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5251**

Barbara M

Hargreaves

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference	5252	Beryl	Burke	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>Dear Sirs,</p> <p>Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds. Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5253**

Brian & Joan

Bell

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5254**

Brian

Johnston

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5255** **Brian** **Settle** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5256** **Carol** **Burnside** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5257 Ms Carolyn Evans** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5258** **Christine** **Hereward** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5259**

C

Lynskey

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5260** **Carole** **Bartlett-Smith** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5261** **Carole** **Broadbent** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5262** **Catherine Hope** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5263	Charles	Murphy	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5264**

Chris

Fevillade

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5265**

Doreen Haworth Watson

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5266**

Claire

Stanway

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5267**

Coral Sunderland Christopher Brelsford

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5268** **Daniel** **Willan** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5269	Derrick	Bartlett-Smith	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>Dear Sirs,</p> <p>Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds. Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5270 Mrs Diane Ewart-Jones**

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

P.S. Please find photocopy of Rossendale Free Press article dated 4th September 2018 "valley traffic is worst"

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5271**

Chris

Whiting

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Rossendale Draft Plan Proposals H4, H5, H13 and H17 Crawshawbooth and Loveclough.

Dear Sirs

I am writing to inform you in the strongest possible means of my objections to the Rossendale Draft Local Plan Proposals regarding the 4 proposed developments between Crawshawbooth and the Burnley boundary.

These proposals completely contradict policies previously agreed by Rossendale Borough Council. This now appears to me to be a complete cop out taking a completely unsatisfactory route to fulfilling government housing quotas.

These developments would adversely affect the rural nature of the area and if allowed would render the whole of the Limey Valley open to a free for all scramble by developers in the future. The local infrastructure is barely coping now so any future development on the scale proposed would have a serious and detrimental effect on the local residents. The increase in traffic would be almost impossible to manage given the current chaos all along the A682 into Rawtenstal1. Developments already in place are going to impact on this situation in the very near future. This fact has been widely acknowledged as virtually impossible to solve. What an earth is the sense in aggravating this further?

It is my understanding that the Crawshawbooth Primary school is fully subscribed and there has been no suggestion of where potentially 200 - 300 additional children could be educated. This could double the current provision. In the current climate any funding for this with be highly unlikely to be forthcoming.

These proposals are ill thought out and require a complete re-evaluation.

Yours faithfully

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5272**

Deborah Brown

Andrew Morris

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5274 Mr	David	Corkin	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5275**

David

Cornforth

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5276**

David Murphy

Joanne Higgins

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5277**

Deena

Burns

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5278**

Denis & Freda

Bowler

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference	5279	Denise	Price	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs,

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Do you wish to participate to the Examination In Public? Did not answer Reasons

Reference **5280 Dr**

George F. R.

Ogilvie

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5281**

Eunice

Brelsford

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5282**

Elizabeth

Foy

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5283**

Eric A

Walton

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5284**

Edward

Higson

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5285**

Elizabeth

Murphy

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5286** **Francesca** **Cornforth** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5287	Fred	Harman	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

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Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5288**

Fred

Keymer

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5289**

George & Avril Tress

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5290**

Gary John

Staley

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5291**

Graham M.

Whitehead

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5292**

Gail

Kershaw

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5293**

Gemma

Smith

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

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H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5294**

George & Pat

Byrne

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5295** **George** **Bhima** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5296	Gina	Bradshaw	Number of supporters:
Commenting on		HS2	H4; H5; H13; H17	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not

Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5297**

Helen

Bell

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Did not answer

Reasons

Reference **5297**

Helen

Bell

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5298**

Graham

Blunt

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5299**

Gwendoune

Fulton

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference	5300	Gwendoune	Leask	Number of supporters:
Commenting on		HS2		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

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H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5301 Ms**

Heather

Munro

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5302 Ms**

Helen

Turner

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5303 Ms**

Irene

Lavin

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5304 Mr Ian Shipley**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5305 Mr J.A. Roberts** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5306 Ms** **Joanne** **Bentley** Number of supporters:

Commenting on HS2 H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5307 Mr	Jim	Brelsford	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5308 Ms**

Julie

Curtis

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5309 Ms**

Jayne

Ducker

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5310**

J

Hooley

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5311 Ms** **Jean Lesley** **Banks**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Thank you for this opportunity to comment on future proposals for extending the village and surroundings. The main Burnley to Rawtenstall road is very busy now, worrying when drivers ignore the 30 speed limit near the school. If 200 houses/ or more are built, the A682 will be overwhelmed. Aah- the school! Is full now, and new schools will be needed for children of those new rsidnets not just primary and junior students - other ones for older students. Any plans yet? Will the Council be able to cope with the demands of flooding, snow and ice in winter, provision of water and importance of sewerage facilities. The Council have many problems and low financial resources to cope with everyday problems for present population.

Information in the locla newspaper Rossendale Valley's traffic os the country' worst. Is now without extra from the proposal to for many new homes - 3,180 over the next 15 years.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5312 Mr Jonathan Lofthouse**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5313 Ms**

Judith

Morrison

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5314 Ms**

Janette

Navan

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5315 Mr James R Pickup**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5316 Ms** **Jean** **Walsh**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5317 Ms Jane Sacks**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5318 Ms** **Janine** **S** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

This proposal is ridiculous. The infrastructure cannot cope now, especially the roads. This was highlighted in the Roassendale Free Press (14th Sept 2018).

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5319 Mr	Jason	Norris	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5320 Mr John Clegg**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

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Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5321 Mr	John	Cronshaw	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5323**

John

Holt

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5324 Ms** **June** **Akerley** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5325**

K & W

Connor

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5326 Ms**

Kathryn

Nicholas

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5327	K	Philipson	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5328 Ms Karen Cornforth**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5329 Ms Karen Hawden**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5330 Ms**

Kari-Anne

Higham

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5331 Ms**

Kaye

Abbott

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5332 Ms** **Libby** **Carter** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5333 Ms Lucy Hughes** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5334 Ms** **Lena** **Lawson** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5335 Ms Lisa Reidsma** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

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Further to the last for H4 Turton Hollow Road Crawshawbooth.

I wish to add a number of concerns: one with regards to the displacement of land to the rear of StoneHolme Terrace, which your building plan plot refers too.

There has been a land slide here in 2014, due to previous building work and from the water load being carried away down the hill. If new houses were to be built here it would undoubtedly put the housing on Stone Holme Terrace at risk again, from further land slides and flooding.

Building new houses would reduce the current residents standard of life and privacy as their present homes would be overlooked and constantly looked into.

The houses on Stoneholme Terrace were built in 1868 and are 150 years old with the old Victorian drainage system in place still to this day. This system would not stand up to more increase in load and pressure, there are constant problems with it at present, more houses would make matters worse.

In this area there are a large number of bats which roost in the houses and trees to the rear and front of the properties, Building houses will vastly affect this protected species.

There are number of birds, birds of prey some on the at risk register and deer which frequent the area for grassing. All these species will be threatened if building is allowed in this area.

You have also known about this for some time, why is it that local residents have only heard about this today Wednesday 19th September 4 weeks into the consultation period, plus we have only heard this from the local residents society why not from the council we pay council tax too.

I wish to object to your present building plans.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5336 Ms	Leanne	Clark	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5337 Mr Lewis Cornforth**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Further to the last for H4 Turton Hollow Road Crawshawbooth.

I wish to add a number of concerns: one with regards to the displacement of land to the rear of StoneHolme Terrace, which your building plan plot refers too.

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I wish to object to your present building plans.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5338**

Louise Edge

Steven Tibbs

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Further to the last for H4 Turton Hollow Road Crawshawbooth.

I wish to add a number of concerns: one with regards to the displacement of land to the rear of StoneHolme Terrace, which your building plan plot refers too.

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There are number of birds, birds of prey some on the at risk register and deer which frequent the area for grassing. All these species will be threatened if building is allowed in this area.

You have also known about this for some time, why is it that local residents have only heard about this today Wednesday 19th September 4 weeks into the consultation period, plus we have only heard this from the local residents society why not from the council we pay council tax too.

I wish to object to your present building plans.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5339 Mrs Margaret Burton**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Its official in Rossendale we have the worst traffic in the country. The roads are very busy already now we have the traffic to and from the abattoir at Dunockshaw as well. Whats going to happen when we get snow and frost with 97 more houses in Loveclough along with the cars one, two or more to each house. The estates are not gritted, and the roads on the hills are very dangerous, the cars are brough down and parked on the main road overnight. I have lived in Loveclough all my life, many times, over the years changes have been discussed e.g. another road being built along the Swinshaw Lane and some houses were compulsory purchased once.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5340**

M

Rhodes

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5341**

Maggie

Clegg

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5342 Ms Margaret Hargreaves**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5343 Ms**

Marion

Brooks

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5344 Mr Mark Cranshaw**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5345**

Mary

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5346 Mr Matthew Anforth**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5347**

Michael

Matthews

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5348**

Michelle

Tinker

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

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Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5349 Mr	Mike	Munroe	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5350 Mr & Mrs A. J. Johnson**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale

development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5351 Mr & Mrs**

Haworth

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5352 Mr & Mrs**

Meadowcroft

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5353 Mr & P. Strong**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5354**

Mr c Ashworth

Mrs W Grimshaw

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5355 Mr Chris Calvert**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5356 Mr Craig Anthony Ellison**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5357 Mr Daniel O'Neill**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5358 Mrs Hilary Stansfield**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5359 Mr Francis Howson**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5360 Mr**

G

Peel

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5361 Mr J Gregson**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5362 Mr Jimmy Navan** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5363 Mr Jack Trippier** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5364 Mr Kenneth Hudson** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

By building houses on the sites you have earmarked, you are destroying the very things that make the area desirable, it is the scenic attraction of the area which make it such a pleasant place to live in, destroy this and you take away a great deal of the areas attraction. As has been pointed out school places and local services will be severely stretched. I se the problems already of traffic on Goodshawfold Rd coming outside Burnley rd and there have already been several accidents at this junction and residents parking has had to be reduced, also parking at school is a problem.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5365 Mr Lewis Pearson** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5366 Mr	Maurice H	Pickup	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5367 Mr**

Roger

Pilling

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5368 Mr Stephen Bayes**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5369 Mr Stephen Rayner**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5370 Mrs Aimee Murphy**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5371 Mrs Ann Corkin	Number of supporters:
Commenting on		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>		
Do you wish to participate to the Examination In Public?	Did not answer	Reasons

Reference **5372 Mrs**

Banks

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5373 Mrs Bett Watson** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5374 Mrs Denise Smith** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5375 Mrs Elizabeth Paul	Number of supporters:
Commenting on		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>		
Do you wish to participate to the Examination In Public?	Did not answer	Reasons

Reference **5376 Mrs J A Evans**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5377 Mrs J Gauntlett**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5378 Mrs J Roberts**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5379 Mrs Janet M Ewing**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5380 Mrs Jean Ellison** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5381 Mrs Jean Spencer**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5382 Mrs Jeanette Wylie**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5383 Mrs Joan Kershaw**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference	5384 Mrs Josephine Cox	Number of supporters:
Commenting on		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>		
Do you wish to participate to the Examination In Public?	Did not answer	Reasons

Reference **5385 Mrs Marie Holden**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5386 Mrs Margaret Kelshaw**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5387 Mrs Mary Buchanan**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5388 Mrs Mary Gregson**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5389 Mrs O Scholes** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5390 Mrs R Heys** Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5391 Mrs & Mr	Clegg	Number of supporters:
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Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale

development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5392 Mrs S Bristow** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5393 Mrs S Charleson** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5394 Mrs Sheila Pickup	Number of supporters:
Commenting on		H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>		
Do you wish to participate to the Examination In Public?	Did not answer	Reasons

Reference **5395 Mrs Vanessa O'Neill**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5396 Mr**

Nigel

Booth

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5397 Ms**

Nancy

Kelly

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5398 Ms**

Natalie

Mather

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5399** **Owain** **Tracey** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5400**

Paul & Jill

Barker

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5401 Mr & Mrs	Boon	Number of supporters:
Commenting on			H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?</p> <p>As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.</p> <p>Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. 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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5402** **P** **Broadbent** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5403**

Pat and Michael Booth

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference	5404 Ms	Patricia	Bernard	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5405 Mr**

Paul

Williams

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5406**

P.B.

Williams

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5407 Mr Peter Riley**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5408 Mr Peter Taylor**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5409 Mr Peter Walsh**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5410 Mr Robert Nicholas**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses) H5 Swinshaw Hall Loveclough (47 houses)

Hi3 Loveclough WMC and land to rear (95 houses) Hi7 land south of Goodshawfold Road (7 houses)

I have lived in Loveclough for all of my life (some 60years+) and seen the steady transformation of what once was an isolated village slowly becoming on the east side of Burnley Road (the A682) what can only be described as an extended housing estate till it reaches the boundary of our neighbouring village Crawshawbooth.

What Rossendale Borough Council (RBG) plan for my village under the Rossendale Draft Local Plan, Pre-Submission Publication Version, Regulation 19 Consultation document will just add another huge block of new housing on the westside of Bumley Road (Hi3) with (H5) on the east side completing the encirclement of the village and opening up the prospect of further development alongside the west side of the road till it resembles the east side. This would not only destroy the character of the village but also rob the area of its much loved open aspect and amenity.

Being an officer of the Limey Valley Residents Association (LVRA) and involved in our joint response I would like to restate some of the points made in that document. The document will beforwardly known as RDLP Reg 19. With regard to (Hi3) the document states "The site slopes westwards and is accessible via Burnley Road. The area is vety open in character and provides long views to the west part of the Valley from Burnley Road. As such development of the site will require suitable mitigation to ensure that the development does not have a significant landscape impact." (RDLP Reg 19, p. 27). The statement is preposterous, what is proposed is impossible to achieve. The breaking into the green ribbon that runs from the Council Boundary with Burnley at Loveclough to Crawshawbooth would create a high visibility blot as new housing cannot by its very nature blend in with the housing in the area. The views from the west side of the valley (which are commented on for their excellence) would be blighted by this development - and of course despite what the council say locals know this will be the thin end of a substantial wedge of nee housing on the west side of the road. How the council can say it will have "no significant landscape impact" simply beggars belief!

Also the site H5 Swinshaw Hall at Loveclough (47 houses). Building in front of a magnificent 15th century hall would simply blight it. The view of the hall from the main road is one of the features of our village and commented on by visitors. Concerning the rest of the site situated behind a ribbon of housing next to the A682 running (North East) from the Old School House 1155 Burnley Road to 1205 Burnley Road. This is a sloping site which in the past due to inadequate drainage has resulted in heavy flooding for some of the properties. The placing of more housing on this site will no doubt exacerbate the risk. Builders, or so it seems, of modern estates give lip service to the meaning of adequate drainage. Also the topography of the far north/eastem field is not suitable for building on being of an undulating nature. The bottom line with all the sites proposed under RDLP Reg 19 is the fact that they could all be accommodated on the east side of Burnley Road including the repositioning of (H5) to mitigate its impact on the village and its Hall.

What lies at the heart of RDLP Reg 19 is the council's inability to communicate which has led to the present situation of RDLP Reg 19 being presented to the local community at what is basically the last minute of the eleventh hour which is by any reckoning wholly unsatisfactory! The residents' ability to respond is constrained by three criteria:

Soundness, legal and Duty to Cooperate. With regard to Soundness, there has been an obvious failure to consult with the local community particularly with those most affected by the last-minute additions to the proposed local Plan. Some may regard this (charitably) as an act of desperation on behalf of the council- I have no such views: this was a deliberate concealment of plans which only now have been sprung upon residents. The failure to consult is provable and has the effect of debasing the plan so far as it applies in our area. locals are far better placed to advise having a greater understanding of their local area, its topography and any issues this may bring forth - which planners do not.

On legal, the LVRA has no legal expertise, but it would seem to run against the grain of natural justice what Rossendale Council have done in this instance - is this really the way the council

operates - and if so can it really be seen as fit for purpose? Placing these proposals on the local population at the last minute hardly seems credible that the council has followed its own procedures. RBC has failed to previously consult on these proposals, and recently it was discovered that the plans had been in the local library for several weeks - and yet

no knowledge of this fact was transmitted to the LVRA or indeed to the local community - their presence only being discovered by accident.

With regard to communicating with the local community the LVRA is well versed in this matter - we have done mail drops and provide the local community with an issue of our four monthly journal the Umey leader to some 1800 households in our patch - with any important information relayed in a turnaround time of at the maximum seven days. The LVRA does have its own web site and Facebook site but not all our residents are technology minded.

The facts are simple, what is proposed would have a major impact on the area. And the Council has failed in its duty to inform residents in a timely manner and give space for proper dialogue on what is planned. The timescale given to residents to respond is pathetically short given the information about the plans has not been forthcoming and indeed seems to have been deliberately withheld! RBC have been as usual backward in coming forward: if they had used their collective intelligence they would realise that they have the perfect vehicle in the LVRA for transmitting information throughout the ward. The small scale method the LVRA employs for communicating with the local resident as outlined above is far superior to anything the council could dream up. I feel lucky to be a member of the LVRA and being able to keep abreast with developments. A good many residents in our patch were until the LVRA meeting on 10th September totally unaware as to what was going to be foisted on them by our council. And what we have here is a further example

that the departments concerned are not fit for purpose.

Besides the environmental impact RDLP Reg 19 would have on the area nothing has been forthcoming from the council about upgrading the local infrastructure, indeed any sound plan would put the infrastructure at its heart. You simply cannot build 200 houses extending the population from say 400 to around 800 within a community of already some 1800 households which is already infrastructure deprived and as the council seem to think all will be well! I assure you it will not!

The road network is at saturation point in Rossendale as a whole, and adding the 360+ vehicles that the sites in Loveclough plus possibly a further estimated 300+ cars from developments to the south of the village at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses), this would add some 1400 additional vehicle movements a day (in and out) to a road (the A682) which due to the geography and the existing built nature of Crawshawbooth simply cannot be upgraded. An officer of the council recently stated that solving the traffic problems in the Borough is impossible. Rossendale is reported as being the 26th most congested area in the country - and the first area outside of a city to be on the list! Source National Infrastructure Commission 08 September 2018 data based on research evidence presented to the NIC. Published as the Prospective: Transport connectivity report, 25th June 2018.

Also despite the number of households in the area and if the council plans go through - along with the additional housing that will inevitably follow will turn Crawshawbooth and Loveclough into a small town which of course will have no health centre or dentist. And of course never will because of the council's inability to think or plan ahead. This will place an extreme burden on the medical services in Rawtenstall and we could end up with a Third World service. The sewerage system is known to be under pressure to cope and this will only intensify if the proposed RDLP Reg 19 goes ahead. The local primary school is already full and yet nothing has been put forward to remedy this situation to accommodate some 300+ pupils. The LVRA recently learned that the current head teacher after previously rejecting any expansion is now willing to the schools expansion. Some of the members of the LVRA have a great deal of experience of the education sector, and it is their collective opinion that an enlargement of the school is not realistic on the present site which is already cramped.

I'm aware of Rossendale Borough Council's commitment to providing 3,180 new houses over the next 15 years as required by central government, and I do have a measure of sympathy with their situation realising that the council has been placed between a rock and a hard place by an uncaring central government who should in the situation faced by the Borough Council which has an already overburdened infrastructure (particularly with respect to the roads) with no real room to manoeuvre would have been wise to grant the valley some form of special dispensation with perhaps the number of houses halved from their current number.

But the fact remains that what is planned for this ward is extremely unacceptable in its present form, and comes into direct conflict with the (RBC) previously adopted Core Strategy drawn up in 2011 in agreement with residents. The council has repeatedly given undertakings that no new developments would take place on the west side of Burnley Road. May I remind the council that the sites (H4) (H13) and (H 17) would total 132 houses breaking the agreement 132 times! An agreement that Planning Inspectors have supported in 2015 and 2017 and to embark on building on these sites would be a gross betrayal of the local population.

I would advise Rossendale Borough Council to take note of the above before reaching a final decision - and indeed before doing so consult with local residents. I have three main objections: First the land earmarked for building on is inappropriate as set out above. Secondly the development of the sites will bring down an environmental disaster blighting the area initially, and no doubt with worse to come as it will set off uncontrolled development in the area. Thirdly, I, like many people in the area, am appalled by the way the council has behaved in this matter - the seemingly underhanded way the proposals have been forced on local residents without due process basically denying people due time to respond.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5411 Ms Rachel Tracey** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5412 Ms	Rachel	Willan	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Roa (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5413 Ms**

Rachael

Rogers

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5414 REVD** **Denise** **Smith**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Rod (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

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This is an article from the Free Press today! What will ou road be like if you build all those houses?

Please se appendix

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5415**

Richard & Katy Bevan

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5416 Mr Richard Collinge**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5417 Mr	Richard	Hartley	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Rod (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5418**

Richard, Isaac. Liam Hunt
Alicia and Eliza
Cox

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Rod (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5419**

S

Johnson

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5420 Mrs Susan M. Booth** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5421** **S** **Shanahan** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference	5422 Ms	Sandra	Holt	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Raod (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5423 Ms Sarah Hardman**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5424 Ms**

Sarah

Johnston

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Raod (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5425 Ms Sarah Pilling** Number of supporters:
Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5426 Ms	Sheila	Cronshaw	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Raod (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5427**

Sherolyn

Miller

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

I am writing in support of the attached letter raising issues and concerns regarding the above planning proposal. I feel that the main points of concern have been covered in the attached letter, however on a personal level I am a parent to three children and have concerns about their future education options, as for several years now they have been issues with local primary and secondary schools being seriously over subscribed, which can only be negatively impacted even further should plans be passed for more family homes. I also have to commute from Loveclough through Rawtenstall daily and it is extremely obvious that the road network is struggling to cope now, the sheer volume of traffic already travelling on this route is way beyond what this road was ever designed for, as you are aware recent observations by an RBC officer concluded that these traffic problems are already at levels that are impossible to resolve, and this is without adding even more traffic to what your officer has already concluded is a beyond recoverable situation. There are many more concerns that the attached letter already covers, environmental and public safety implications, increased pressure and demand on many already struggling public services including doctors surgeries and dentists. I understand that there is a need for more housing in the Rossendale area but the Loveclough and Crawshawbooth areas are already struggling to cope with the sheer volumes of new houses that have already been approved / built. Please consider the needs and necessary public services that the families and residents in this area are already finding difficult to access and utilise before you make a decision.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5428**

SJ

Casey

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5429 Ms**

Sonia

Howarth

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Raod (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5430 Ms** **Sonia** **Lofthouse** Number of supporters:

Commenting on H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

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Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5431 Ms	Stella	Holmes	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Raod (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5432 Mr Stephen Charleson**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5433 Mr Stephen Sawicz**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5434 Mr Steven Philips**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5435 Ms Susan Casey**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5436 Ms Susan Donn**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5437 Ms**

Tracey

McMahon

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

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Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5438 Ms**

Tracey

Ward

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5439 Ms** **Victoria** **Holt**

Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Raod (7 houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses).

Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5440 Ms** **Vivien** **Howarth** Number of supporters:

Commenting on

H4; H5; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has trully followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

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Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate and additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5441 Ms	Vivienne	Gardner	Number of supporters:
Commenting on				H4; H5; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses) H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Raod (7 houses)</p> <p>I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.</p> <p>Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.</p> <p>First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents</p> <p>Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.</p> <p>Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .</p> <p>Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.</p> <p>Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for.</p> <p>Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.</p> <p>I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		
H4; H5; H13; H17; H72				

Reference **5030**

David

Foxcroft

Number of supporters:

Commenting on

HS2

H4; H5; H13; H17; H72

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Representation dated 28/09/2018:

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

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I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Representation dated 30/09/2018:
Ref – Local Plan consultation

I am writing to you following conversations with many residents across Rossendale in relation to the Local Plan and the latest revision which has now gone out to public consultation. I want to comment on three aspects of the plan and look forward to hearing your response. Whilst the number of properties being asked of in Rossendale is still particularly high I am pleased that since the first publication the Council has worked with our local MP and he has managed to successfully have the numbers for our Borough lowered. It was, however, disheartening to see that some of the biggest areas of concern from the first publication have not been tackled and other changes have been shoe-horned in under the radar.

Looking firstly within my own division. In 2015 and 2017 Planning Inspectors have ruled twice that countryside to the West of Burnley Road should be kept clear of development. At a meeting of the Limey Valley Residents Association in July 2017 the Leader of the Council was quoted as saying that 'RBC would seek to fulfil its undertaking to allow no significant development to the West of the A682', and indeed in the first publication this was the case. However, in this second publication (which has a shorter consultation period and almost no public engagement sessions) areas to the West of Burnley Road have been identified for up to 100 homes, additional 'Emergency Allocation' and additional smaller areas for housing. Please could you explain what has caused such an about turn from the Council in the intervening 12 months, particularly when the number of homes the Borough is required to provide for in its Local Plan has decreased?

Secondly I have been looking across to Edenfield. In the first publication of the plan it was identified that the land identified in this small village would increase the housing stock in the area by almost 50%, putting a massive strain on the already tight infrastructure. To many people this was (rightly) seen as a significantly unfair demand on such a small area. Residents worked together to provide representations to the Council and there with over 800 objections submitted. Put another way 30% of the total number of responses to the first publication from less than 3% of Borough residents. Given the lower numbers now required myself and others had hoped that common sense would prevail in the second publication. Sadly it appears we were wrong. Please could you explain why such significant views have not been addressed by the second publication when others have, including (a point I'm coming onto) the relocation of the Gypsy and Traveller site?

That brings me nicely to the most controversial change of the all – the proposed location of the Gypsy and Traveller site. To begin with, I'd like to understand how it came to be that at the meeting of the full Council it was proposed to move the location to Futures Park, an idea which hadn't been published and Officers had had no opportunity to

explore. Surely such an action should have been given the time to be properly considered? Perhaps then the Council would not be in the situation it currently finds itself in. Since the meeting 1922 residents have signed the online petition (second only to the number who signed to keep free parking) and a small group of residents have started to do the Councils homework for them.

If we look back to 2013 Ride-On put forward a planning application to develop part of the site and create a new Trail head centre. As part of that application a Ground Investigation report was carried out on behalf of the Borough Council. This report makes for some very disturbing reading particularly in relation to Plot 5 (in the Local Plan map published to identify the proposed location for the Gypsy and Traveller site this is listed as Plot 3, however when comparing both maps it is quite clear they are one and the same). The report states when discussing plot 5 that 'An area of leather waste contamination present advised to be 550m²; possible contamination by volatile organic compounds (VOCs) noted.'. Further into the report it then reads 'Leather waste has been reported in one area which may have resulted in the presence of a range of pollutants associated with various tanning processes as well as generation of polluting leachate and hazardous ground gas from the degradation of the organic material present. Leather waste may also be associated with anthrax spores, which may remain viable for decades under certain conditions.'

As I am sure you can imagine this makes for incredibly disturbing reading and many residents are struggling to see how this situation has been allowed to happen, or why the site is still open to the public given the gravity of the findings. Since the publication of the report please can you confirm if and when the site has been properly cleared and made safe? If this hasn't taken place please could you confirm why it hasn't and why the site is still open to the public? From initial research the residents have undertaken it appears that this hasn't happened which has the potential for significant issues for residents in the area. Indeed I have heard from residents of children being on the site and picking berries that have grown in the area! Another question which I think residents need to know the answer to is how a situation arose where Councillor Sean Serridge, Deputy Leader of the Council in 2013 at the time of this report, came to propose this as a viable solution for the location of the Gypsy and Traveller site, which was originally planned to have been proposed to be in his Ward? Given the significance of the report he must have known about the issues it highlighted and that these were potentially still to be addressed. How was this allowed to happen?

I look forward to hearing from you in due course in relation the concerns raised.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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H4; H5; H6; H7; H13; H17		
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Reference **5107 Mr & Mrs**

Derbyshire

Number of supporters:

Commenting on

HS2

H4; H5; H6; H7; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan comply with the duty to co-operate? **Did not answer**

To whom it may concern,

Please accept this as an objection to Rossendale's Draft local plan proposals for the area of Loveclough covering areas defined as H4, H5, H6, H7H13, & H17.

I do not believe the areas detailed for development are appropriate on the following grounds:-

1. The council had repeatedly given an undertaking THAT THERE WOULD BE NO NEW DEVELOPMENTS TO THE WEST OF BURNLEY ROAD.

2. LOSS OF OUTLOOK FROM THE A682.

The ease in which the council now appear to be retracting this is nothing short of startling. Every morning going to work I admire the outlook, the landscape. cloud formations, light etc.,. If I admire these attributes other people must also (residents and visitors alike). The views and outlook are nothing short of spectacular. I'm not sure why RBC would be looking to remove something that adds to the quality of life and the mental wellbeing of its residents. The location you propose for future development would destroy these views forever (they would essentially benefit the few at the expense of the many). This has happened previously and shouldn't be allowed to happen again. In my view the open outlook to the west of Burnley Road should NEVER be developed (over and above that already developed).I would even argue RBC should be looking to reclaim the land to the West of Burnley road as and where possible.

3. ECONOMIC ARGUMENT

People visit Rossendale for the views and for the open countryside. Visitors and tourists alike support the local economy. Visitors spend and add to the local economy. People like what they see, return and add to the economy. This creates a multiplier / accelerator effect for the local economy. This is one of the few unspoilt views in Rossendale. Let's not go the same way in spoiling this view with housing developments as has been done elsewhere with wind turbines.

Developments in the areas detailed will inevitably cause congestion. With an average of 2cars per household it is inevitable. It could have an adverse effect economically and jeopardise the way the area is perceived. People do not visit the countryside to be subjected to congestion and traffic jams.

4. Further developments will exacerbate current issues of LIGHT POLLUTION.

5. INFRASTRUCTURE IS NOT CURRENTLY IN PLACE / HIGHWAY SAFETY ISSUES / VEHICULAR ACCESS / INABILITY OF RESIDENTS TO PARK OFF THE A682 in adverse weather.

Schools are stretched, libraries and leisure facilities have until quite recently been threatened with closure. During adverse weather, especially in winter, cars and people migrate from developments on and along Burnley Road onto the main A682 (as the road is flatter than where residents live effectively causing the road to narrow). This makes the road unsafe for motorists and pedestrians alike. Until Lancashire County Council / Rossendale Borough council acknowledge there is a problem and eradicate this through the provision of off-road parking no further developments of this nature, in this area, should be considered or sanctioned. Double yellow lines do not work, motorists simply park on them as there is nowhere else to park (case in point is outside the post office / convenience store in Crawshawbooth).

Hotspots are as follows

(i) Boundary Garage - there is a blind corner before hitting parked cars. There have been several accidents, with some fatalities. (East side of Burnley road)

(ii) Exit from Badgercote. People enter Burnley road blind as there are parked cars to the right. (East side of Burnley road)

(iii) Junction at Hamer Avenue - same problem as above. (East side of Burnley road)

(iv) Junction where Stotts Motorcycles was (opposite former Jester Public house - now funeral directors) - problems both exiting and accessing Burnley Road. (East side of Burnley road)

(v) Kershaws printers - problems entering and exiting as problems with parked vehicles both sides of the junction (West side of Burnley road)

(vi) People regularly pull out into oncoming traffic, driving is dangerous and when visibility is poor the problems increase tenfold. Motorists cannot see you or you they.

13 December 2018

For the record I have been doing this journey to South Manchester for c.12 years. I feel were you to make a similar journey in rain, sleet, hail and snow you would understand exactly where I am coming from and what I am talking about. To allow any exacerbation of already existing problems would be foolhardy.

6. **T**RAFFIC GENERATION -

(i) Traffic can be horrendous in Rawtenstall. The recent introduction of lights has brought the town close to standstill.

(ii) Traffic is terrible on the M66.

Accidents essentially bring both A road and by-pass/motorway to a standstill. When this happens nobody gets to work.

I feel Rossendale Borough Council should review the suitability of land adjacent to Burnley Road and consider more suitable areas, or, be throwing this back to central government.

How about accommodating their proposals on the proviso they provide funding for a third lane in both directions on the M66 and / or a train line/link to central Manchester.

What they should not be doing is putting this kind of pressure on a borough such as ours.

7. **S**CHOOLS - My daughter attends Crawshawbooth Primary School. One of only two primary schools between the Burnley/Rossendale Boundary and Rawtenstall. I believe both schools are already operating at full capacity with no scope to extend facilities.

8. **B**EFORE AND AFTER SCHOOL CLUB - My daughter attends the before and after school club at the school. Due to car park limitations parents (dropping their children off and picking them up) have to park on the main road (A682). There is no parking in the school grounds for parents dropping off or picking up. I am currently forced to park in front of somebody's drive, or, in front of a designated bus stop on a daily basis. In the event there is a space elsewhere I have to stop on a main road and reverse into the space (I cannot drive in as there isn't enough room). This takes time and prevents traffic passing. I straddle both lanes and effectively block the only road between Bury and Burnley. The manoeuvre is extremely DANGEROUS as there is constant traffic in both directions. In dropping my daughter off I have to bring my wing mirrors in to avoid them getting knocked off. When getting out I cannot see the traffic and effectively walk out into a road with oncoming traffic. It is a matter of time before I or somebody else gets killed. It is an accident waiting to happen. [Over time parents have received no fewer than 30 notices (this year alone) advising them not to park in the school grounds from the headteacher. These notices are often ignored by some parents because of the dangers to parents parking on Burnley Road.]

9. **N**URSERIES - EDUCARE FOR EARLY YEARS. Dropping off is again problematic. You access and exit via a blind junction. Again, it is a matter of time before somebody gets killed.

10. **F**ACILITIES ARE LIMITED TO NONE EXISTANT. RBC have sanctioned the conversion of two public houses to funeral directors and multi let dwelling house. I'm not sure why when facilities are limited to residents as it is. Where facilities are available notably Crawshawbooth there is little to no parking, or, where there is parking there are yellow and double yellow lines meaning people have to travel everywhere by car.

11. **S**EWERS AND DRAINS - There are drain problems on Goodshaw Avenue North following the building of the new estate. My father experiences ad hoc problems on a regular basis off Goodshaw Avenue and United Utilities are regularly in attendance. Employees acknowledge the problem and that the drains are essentially unsuitable for the increased number of dwellings. The new sewers on Burnley Road under the road in the area around Boundary Garage regularly block with discharges of animal blood and viscera from the abattoir to the north causing a health risk to residents. Air pollution is often evident for weeks, months on end.

12. **B**LIND ACCESS ONTO BURNIEY ROAD (JUNCTIONS) - Accidents are commonplace. I lost a friend from primary school who was knocked down on Burnley Road. Somebody I know from school lost a limb on the corner where the Boundary Garage is. A young girl was killed on the same corner. There are railings on the West side of this bend. Despite this you are suggesting a development detailed as H6. Do this railings not suggest something?! I have seen a 4 car pile up only 12 months ago between our house and the former Glory. I have seen umpteen accidents between our house and the reservoir. I have seen an X43 bus slip back and plough into the bus stop in Crawshawbooth in adverse weather quite recently.

13. **I**believe developments many of the suggested sites INTRUDE ON OPEN COUNTRYSIDE.

Were Rossendale Borough Council to address the above I would support any development EAST of Burnley Road, excluding the development proposed for the bend as I consider this too dangerous a location.

- Starting with the removal of the fire station and the lights in Rawtenstall. Re-introduction of roundabouts and allowing the free free flow of traffic through Rawtenstall, to

avoid grid lock and the persistent bottleneck would essentially be a good start.

- Increase the M66 from Bury to Rawtenstall and Rawtenstall to Bury from 2 to 3 lanes both sides.
- Develop one or both of the primary schools and provide parking for collection / pickup. It is not safe to ask small children to walk home on their home. For several months it is dark and dangerous.
- Create parking. The rise near Stotts is already a bottleneck in winter (parking on Burnley Road). Consider making the area near the care home formerly Davidson's farm hardstanding for c.50-100 cars could prove useful. Could look like grass, however would be hardstanding.

More appropriate sites to the ones detailed would be towards the rear of Badgercote and Reedsholme.

Thank you in advance for considering the above rushed objection.

Do you wish to participate to the Examination In Public? Did not answer Reasons

Reference	5113 Mr	Darryl	Nugent	Number of supporters:
Commenting on		HS2		H4; H5; H6; H7; H13; H17
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer

Proposal for future housing development in Goodshaw Ward are as follows.

H4 Turton Hollow, Goodshaw – Largely Greenfield - 30 units

H5 Swinshaw Hall, Loveclough – Greenfield – 47 units

H6 Land to South of 1253 Burnley Road, Loveclough – Greenfield – 5 units

H7 Land adjacent to Laburnum Cottages, Crawshawbooth – Greenfield – 10 units

H13 Loveclough Working Mens’ Club and land at rear and extension – Mixed – 95 units

H17 Land south of Goodshawfold Road – Greenfield – 7 units

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A total of 194 units between Loveclough Boundary and Reedsholme.

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

I must first state that I am aware of, and appreciate that Rossendale Borough Council and its planners have to provide the means to build 3180 new houses over the next 15 years. On the one hand, there is central government making its demands for strategic planning on local authorities. On the other are the interests and concerns of those residents who will be affected, often adversely, by what is proposed. My comments are directed at the six proposals in the Goodshaw Ward as outlined above. My first reaction following the publication of the proposals was that, given the importance and potential impact on our area, the timescale for response was inadequate. To ask residents to find, read, understand and digest the vital information on the given area and respond fully and coherently within the timescale, was entirely unacceptable. Given that the inclusion of H13 (land adjoining Loveclough WMC) was included at the last minute, without any consultation, questions the legality of the proposals.

The Publication (Regulation 19) stage of the Draft Local Plan, states that residents’ ability to respond is constrained by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a complete failure to consult those residents most affected by the last-minute additions to the proposed Local Plan (particularly with respect to H13). Displays in Rawtenstall are of no use to many residents who either work or are otherwise unable to view the proposals. Reliance on these and the Borough’s “hard to negotiate” website is insufficient. A simple mailshot would have been cheap and 100% effective. Having lived in the Borough for over 40 years and as an officer of the Limey Valley Residents Association I am well placed to comment on the appropriateness (or otherwise) of particular sites, having a knowledge of the topography and attendant issues which elude even the most conscientious planners. I have expanded my concerns in greater detail in Annex 1 below.

On Legal, the failure to consult on these proposals until this stage is clearly contrary to natural justice. Although I have limited legal expertise, I would ask if Rossendale Borough Council has truly followed its own procedures before presenting residents with these late.

As RBC has failed previously to consult on these proposals, I feel that as a resident I am justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow, Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections and, in a couple of instances, offer appropriate criticism which I hope will be helpful to planner when making their final proposals.

As previously stated, I am aware of Rossendale Borough Council’s commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as proposed is inappropriate, excessive, ill-advised and, to existing residents, unacceptable.

First, Rossendale Borough Council (RBC)’s previously adopted Core Strategy, arrived at in 2011 after consultation with residents’ representative agreed that there is to be “no

new developments west of the Burnley Road (A682) in this area". RBC has repeatedly given an undertaking to this effect since 2009. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would mark a complete U-turn on this undertaking and, consequently, a snub to the expertise of inspectors and a betrayal of residents.

Secondly, whilst the previous suggestion helps RBC achieve its target, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. It amounts to an additional development almost the size of Badgercote and Penny Lodge together and is disproportionate. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 - an overwhelming development - is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are particularly ill-advised. H5 and H13 are both sloping, ill-drained sites. The topography verifies this; the land is sour as proven by the presence of tussocks. RBC has rejected a number of brownfield sites as unsuitable due to flood risk. I would suggest that the same restrictions be applied these two sites in Loveclough. At nearby Badgercote, there is an on-going problem of properties' basements being flooded by run-off in inclement weather – a problem ignored by the then developers. I am concerned that similar such developers may be allowed to move into Goodshaw and create similar problems.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 – Burnley Road – already a very busy main road linking Rawtenstall with the M66 and Manchester via Rawtenstall. The addition of further traffic has both environmental and safety implications. The proposals suggest that approximately an additional 360 vehicles from Goodshaw will use this road daily mainly travelling towards Rawtenstall heading for the M66. This would be in addition to a similar numbers estimated at 300 from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). The geography of the area prevents any upgrading of the A682 to a suitable standard and together with the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be render the town gridlocked at rush hours, there being no other route to the M66 for southbound traffic, and potentially at other times. An officer of RBC recently observed that "solving Rossendale's traffic problems is impossible". Coincidentally the front-page headline of the Rossendale Free Press dated Friday September 14 2018 read: "We have the worst traffic in the country", which underlines the traffic problems endured by residents commuting both north and south. The RFP cites a report by the National Infrastructure Commission which advises the government on transport and housing issues. Both statements are absolutely correct. Rossendale was built in the 19th century with no concept of the volume of traffic it would be expected to cope with in the 21st.

Fourthly, the local primary school is already full and there are no published plans for it to expand to accommodate an estimated additional 300 pupils. As a retired teacher of more than 30 years, I am convinced that there is an optimum size for a primary school. It is my view that the enlargement of the school to the size required to accommodate these children is not feasible on its present cramped site together with being educationally unsound. This view is shared by many other education specialists. Thus the problem exists on where to accommodate these children locally to avoid local children travelling out of the ward for their education..

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if the proposals are approved. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for in Goodshaw Ward alone. Currently our medical and dental are located in Rawtenstall, a car/bus ride away. St James Medical Centre is at capacity as are the local dental practices. This problem will not affect developers but will be certain to affect residents, old and new alike for years to come. Surely, if common sense were to prevail, the logical approach would be to prepare and upgrade the entire infrastructure before considering wholesale developments of this magnitude.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. It is evident that this will be top of any developer's wish-list and allowing building to proceed in the timeframe RBC has adopted will turn Loveclough into a building site for five years, making residents' lives intolerable. Moreover, once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, RBC would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty. Given that there is a tendency among developers to "cherry pick" the most profitable sites and avoid those less so, RBC could be in a position of having these sites developed and developers approaching the Council for additional permissions for nearby

land on the basis that the targets are not being met. Any appeals for such refusals are likely to succeed.

In conclusion I would urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability. In summary my objections are essentially two. First, the land and location proposed is inappropriate for the reasons set out above: implementation will produce a developmental and environmental disaster. Secondly, I have serious concerns about the way and the speed which the proposals have been presented to residents without due process, thereby reducing their ability to respond effectively and fully within the timescale extremely difficult, if not impossible.

Darryl Nugent

Annex 1

Proposal for future housing development in Goodshaw Ward are as follows.

H4 Turton Hollow, Goodshaw – Largely Greenfield - 30 units

H5 Swinshaw Hall, Loveclough – Greenfield – 47 units

H6 Land to South of 1253 Burnley Road, Loveclough – Greenfield – 5 units

H7 Land adjacent to Laburnum Cottages, Crawshawbooth – Greenfield – 10 units

H13 Loveclough Working Mens' Club and land at rear and extension – Mixed – 95 units

H17 Land south of Goodshawfold Road – Greenfield – 7 units

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Overview

A total of 194 houses built adjoining the A682 at Loveclough and Crawshawbooth is both excessive and untenable for the following reasons.

a) The A682 Rawtenstall to Burnley road is the only means of access and egress for the population of Goodshaw Ward and those to the south. The road is busy throughout each weekday and is congested during the morning and evening rush hours. An additional 194 properties with the potential for up to 400 cars using the A682 would certainly result in an increase in traffic congestion, particularly as any expansion of the road would be impracticable.

b) Since Rossendale cannot provide an additional 400 jobs within its boundaries for the owners of these properties, commuting to the north and south of the ward would be an essential way of travel to work. Since Burnley cannot support the type of jobs required to finance purchase of the proposed houses, the majority of commuters would do so towards Manchester via Rawtenstall. Rawtenstall, already a bottleneck would likely grind to a stop during peak periods. The traffic problems will also be further exacerbated by the proposed developments to the south of the ward at The Hollins (H11) with 70 units and Reedsholme Works (H12) with 110 units and Car Farm (H18) with 25 units. The impact of around 800 cars (two per household) in addition to existing traffic, hitting the centre of Rawtenstall at peak times needs no explanation.

Opening up a rail link from Rawtenstall to Manchester is laudable and could relieve some congestion on the M66. However residents living in Goodshaw Ward will still have to negotiate the A682 with its inherent congestion issues.

c) Crawshawbooth Primary School is already full to capacity. With a potential 400+ children requiring school places, the school would have to expand to almost double its size. Alternatively children would have to travel outside the ward for education or a new primary school would have to be built. Either way the "school run" would impact seriously on the traffic problem. Additionally the potential of 700+ children (current and projected) travelling to and from school would increase the potential for serious accidents. Ofsted recently commented on the traffic hazards in a recent inspection of the school.

d) A similar picture exists with the local secondary school, Alder Grange, vehicular and pedestrian access to which is from the already busy A682.

e) The current provision of medical and dental care in the area is poor. The national shortages of GPs and the general reluctance of dental practices to attract NHS clients will be further exacerbated by an additional 800 souls seeking treatment. Currently there are no local Medical Practices serving Goodshaw Ward residents. All residents of

Crawshawbooth, Loveclough and Goodshaw have to travel for treatment. The closest at SJMC and The Hub also serve a wider area of the valley. It is doubtful if together, they could cope with the extra clients.

f) Loveclough currently has approximately 781 housing units. The proposal seeks to add a further 154 (H5, H6, H13, H17). This represents an increase of over 20% on the housing stock. Furthermore, Loveclough is set to bear the brunt of future development in the Goodshaw Ward – 84% of the above proposals, and with a small exception all the proposed developments will take place on Greenfield land. Notably the two largest proposals (142 units) are concentrated at the northern boundary, creating a large mass of housing. The number of properties amount to a sizeable village with no apparent provision of other services expected in such a settlement.

g) The type of property which would be the preferred type for developers for this area (4-5 bedroom properties) is not that required within Rossendale. Smaller, starter properties located nearer viable transport hubs would be the norm.

h) The current government has mandated that RBC provide in excess of 3180 housing opportunities in its Local Plan. The viability of this is in doubt given the topography of the Borough. However what is needed in the Valley is houses affordable by the younger, newly-weds of the valley. A view of local estate agents' lists shows a large number of the large properties referred to above as being unsold for a considerable time. There exists the danger of young couples having to leave the Valley due to being unable to find suitable, affordable properties. There is little need for yet more large family units.

i) Each of the developments has a clause to identify and contribute towards parking facilities in the nearby Local Centre at Crawshawbooth. Given the lack of available space in Crawshawbooth, it is difficult to imagine how this might be achieved.

Individually

H4 Turton Hollow, Goodshaw – Largely Greenfield - 30 units

Apart from the observations a-e above the LVRA sees little objection to these proposals. The size is relatively small and is set in an already developed setting.

H5 Swinshaw Hall, Loveclough – Greenfield – 47 units

H6 Land to South of 1253 Burnley Road, Loveclough – Greenfield – 5 units

On addition to the observations a-f above, the LVRA has serious reservations about the proposal. The beautiful setting of Swinshaw Hall and surrounds would be destroyed by what some might describe as a modest development. Goodshaw Lane, a narrow (almost single track) road could become subject to a unsustainable volume of traffic (potentially 100 cars). The proposal would also result in an urban continuum from Rawtenstall to the RBC boundary, on the eastern side of the A682. The urban form would be likely to creep eastwards in the future. RBC would have few grounds for refusing any large scale development proposals easterly encroaching on the beautiful moorland between Goodshaw and Water.

H7 Land adjacent to Laburnum Cottages, Crawshawbooth – Greenfield – 10 units

This small development could be acceptable with concerns regarding the access/egress via Church Street which is currently blighted by parking of Church Street residents' cars.

H13 Loveclough Working Mens' Club and land at rear and extension – Mixed – 95 units

Perhaps the most controversial and unacceptable proposal of the Draft Plan.

In addition to the above observations a-f, the LVRA would also have the following concerns. Access to the A682 would be via Commercial Street, a steep road to the west of the A682. The vast majority of the 100 or so cars entering the A682 at busy periods would endeavour to turn right towards Rawtenstall as outlined in observation (b) above. The potential for accidents would increase many fold. Residents have regularly expressed concern about speeding cars and accidents both reported and unreported on the A682 over the years. Another 100 vehicles would increase this risk to an unacceptable level.

For many years, RBC has stated that “there should be no substantial development to the west of the A682 at Loveclough”. The proposal is a complete U turn. These grounds were applied in the successful refusal of a recent application for development on the western side on the A682. Indeed the Inspector in charge of the appeal supported this view in his report. Should this proposal be allowed, RBC would have no grounds for refusing any further applications for infill development to Greenfield land to the west of the A682 from Goodshaw (Middlegate) to the RBC boundary at Dunnockshaw. Such long term development would totally destroy the rurality of Goodshaw Ward in general and Loveclough in particular. This proposal should be scaled down significantly if not removed in total.

H17 Land south of Goodshawfold Road – Greenfield – 7 units

A small development which in addition to the observations above, will have a serious impact on the wellbeing of the residents of the terraced row to the east of the site. Furthermore, future applications for developing the land to the south of the site would almost certainly ensue. RBC would have few grounds for refusal. The access via Goodshawfold Road is a serious concern, This junction has been the scene of many road accidents most, fortunately, minor. Any additional traffic flow at this junction can only exacerbate the problem. Attempts by LCC to alleviate these problems at the junction have met with little success.

Summary

Whilst the I appreciate that RBC have little choice but to provide housing opportunities as outlined in the government’s Housing Policy, however short-sighted and misguided they might be, RBC needs to be cautious in the location and density of the proposals in the Draft Plan. Housing needs to be of the type needed rather than driven by developers’ preference. The preservation of the beautiful rurality of the Valley in particular and the Goodshaw Ward in particular should be paramount. The proposal of so much Greenfield land for development in Loveclough represents poor planning and the long term prospects of the area created by these proposals is unacceptable in the present form. Housing needs to be located local to transport hubs. Rossendale has an excellent bus service to Manchester and a potential rail link. This is an opportunity to build on these facilities without destroying part of the natural beauty of the Valley by overdeveloping Loveclough and surrounds. I would recommend that RBC addresses the concerns outlined above and revisits the proposals for the above with a view to reducing the volume of housing units in the Goodshaw Ward (H4, H5, H6, H7, H13, H17).

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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H4; H5; H7; H13; H17		
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Reference **5008 Mr**

Chris

Henry

Number of supporters:

Commenting on

HS2

H4; H5; H7; H13; H17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I AM A Resident of Crawshawbooth and would like to object to the RBC Proposed Housing Scheme, currently under Review.

- Since 2009 RBC have made frequent declarations that there will be no developments West of A682 Burnley Road in this area (H13 / H17). This Statement is within RBC's 'Core Strategy' and supported in 2015 and 2017 by Planning Inspectors.
- No Locals have been consulted about the proposed scheme, until the recent meeting at 'The Top Club', Loveclough. As RBC have continually failed in their duty to keep the Community informed and we are literally weeks away from 'decision day' and as some of these buildings are to be built within the specific area in which I live, I feel justified to object about the specific areas around which I reside (H4,H5,H7,H13,H17) :
- Sites designated are within RBC's stated "Countryside" area and lie outside of RBC's 'Urban Boundary'
- H13 is located directly between the two 'Conservation Areas' of 'Loveclough Fold' and 'Goodshaw Fold' - I am also concerned that this area between those two villages will be targeted in the future.
- There is no guarantee that "the scale and nature of the development would be in keeping with the character of the Settlement" as those guarantees have been broken in the past.
- 179 houses crammed into the tiny areas of H4, H5, H13 and H17 will change these areas forever, reduce the already scarce amenities, seriously affect the appearance and rural setting of our historic 'Swinhaw Hall' and all squeezed in between two "Conservation" areas.
- Increase of Traffic on A682
- There are no Infrastructure plans (within the proposal) – no plans to create or improve the area, prior to building in relation to :
- No provision for a Doctors Surgery
- No provision for a Dentist Surgery
- No provision for any kind of Shops
- No detail improvements regarding Water capacity
- No detail improvements regarding Waste Water capacity
- School capacity is already at 100%
- Road capacity is already at a seriously dense level
- The area H13 is already open to flooding within the very area where another 93 Houses are proposed to be built
- 183 new houses in the Loveclough / Crawshawbooth area will equate to say 250+ vehicles and between 200 and 300 children.
- Our roads are smaller, country roads and – as officially stipulated in the recent meeting at 'The Top Club' in Loveclough CANNOT be widened – a daily traffic snarl up, waiting to happen.
- Our Primary School is at CAPACITY NOW with it's maximum +/-300 pupils and is a VILLAGE SCHOOL.
- And other Residents who live here, do not want a larger, sprawling School which is situated on the one and only road through this VILLAGE area – the congestion in front of the School is already of a dangerous nature.

Crawshawbooth and Loveclough are small VILLAGES....Loveclough is just a collection of countryside houses, in a RBC ,DESIGNATED "Countryside" area and no longer even has a Public House.

It is stated by Locals that few current Residents of the area, will be in a position to purchase any of these new abodes, which leaves the obvious conclusion that non-Rossendalians will continue to proliferate in the area – we will soon become the 'Manchester overspill' area, which some believe Rossendale already is – a little like Milton

Keynes has become an overspill area for London. There ends the attraction of living in a Village.

I am concerned that Rossendale will become a completely different area – more congested, with little to zero road improvement, with (in my own area) a compacted Primary School and similarly over-subscribed Secondary School (Just over 1 mile away, towards Rawtenstall). All of these points of objection, are subjects which are beneficial to the local community – there are few benefits TO the community of welcoming another 300-400 individuals and similar amount of vehicles, to our already congested area.

In addition just this week, we have had the news that Rossendale has the 3rd most congested road system, outside of any City in England NOW.

Within this RFP report, our own Conservative MP Jake Berry states “Our Transport System in East Lancashire.....has been underfunded for decades which is why our levels of congestion are so bad”. This would appear to be one of those “known” facts, ignored by Government, in place of more salubrious projects.

I would hope that RBC will take on board the comments provided by myself and others within Rossendale, when coming to a final conclusion on this matter : the destruction of what is a natural area of beauty and which includes conservation areas, is a seriously damaged future for Rossendale to accept.

Regards

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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H40

Reference **69 mr michael foley** - Number of supporters:

Commenting on greens farm - H40

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Both of these sites require the moving of the Urban Boundary which we feel is unacceptable in the light of the cross-party Keep Rossendale Valley Green campaign which has succeeded in reducing the number of housing sites required by Government for Rossendale. Both the Bull Hall and Greens Farm sites fail the sustainability criteria set out in PPG which states they must be within 400 metres of a regular transport service, since January 2017 there has only been a twice daily school bus service between Bacup and Todmorden. The development is planned on greenfield – The site has poor access - - The assessment states it's on a gentle slope this is not the case as it is a steep slope site. - Vehicular access is going to be a major problem with the potential of causing travel delays and danger to children playing on streets. - The site is surrounded by mature trees and dry stone walls that all need conserving and should not be removed and walls would need repair - - There is poor access to strategic road network and the assessment talks of 3.5 miles distance which feels like a very underestimate. - Public transport is very poor, schools and GPs are all a distance from the planned development. - There is already a vast amount of recent housing developments of 3-4 bedroom houses in the Bacup area that have flooded the market, some housing has still not been sold and it has caused a flooding of the private rental sector – - There is a water flood issue that the site drains and holds a large amount of water that runs down to adjoining site on Rosemount and Moorview, if building on the site and preventing water draining and increasing run of rate this has potential to cause problems for adjoining housings and drains. - The assessment talks of an hourly bus service but this is not the case at weekend there is no service between Todmorden and Bacup - The assessment speaks of developing higher value properties, as we have already stated the market for 3-4 bedroom house in Bacup. Further large 3-4 bedroom houses has potentially the effect of actually depressing prices in the Bacup area, prices are static or losing value it would seem strange to want to add to large houses that don't seem what the market needs – What's happening to 2 bedroom LA / HA properties. - My understanding is this land is green belt and was not within the urban boundary - Wildlife - - The fields at Greens farm act as run for Foxes, we get bats flying across the field and around the houses at the top of Rosemount, these bats return each summer to the area. - There are field mice, shrews, hedgehogs using the green fields. Various small birds feed in the fields, thrush, blackbirds, greater spotted woodpecker, redwings, blue tits, great tits, gold finches, sparrows, starlings, robins, dunnocks, magpies, crows, doves and buzzards. - Environment - The fields have a number of large trees that larger birds use to nest each year. - These large trees are the last line of larger trees before you gain further height and only have smaller trees and shrubs. - The open fields also have a number of natural water springs. We list the springs as they cause some potential to create a flood worry for us on Rosemount during heavy rain. At present the drains have dealt with the springs that come through the dry-stone walls but if building were to take place in the field and concrete and tarmac were to take away the natural draining into the field/grass the danger of standing water and flooding to houses further down the hill could increase. - Weather considerations - It is worth note that the urban boundary being looked at is at a high altitude - Housing would be difficult to heat or require constant heating in the cold damp Bacup climate especially winters. This is at a time there are concerns about the use of energy. - Drainage – At present I understand houses on Moorside struggle with surface water that comes down the hill from open fields. The problem of water drains becomes worse when you get onto Todmorden Road and down into Bacup where drains do not cope and often have running surface water – To build further on high open fields covering with Tarmac and concrete is only likely to increase drainage problems. - Density – This is a large change to the urban boundary, with what we feel leaving open further request to extent towards todmorden road area - The present planned urban boundary changes and suggested housing development will automatically create an area of high density housing. - Unused sites - We have concern that there are a number of sites held waiting development i.e. greens nook lane, Old GP surgery todmorden Road, old mill stone name just three. Surely to aim should be to use up land already vacant before moving the urban boundary. - - There does seem an issue of builders stock piling land and not considering affordable housing. Social Implications - Transport – Public transport and car access to Bacup has always been under strain. - There are no local trains that can help reduce road congestion. - Although buses are fair in the rush hour, they are poor at other times. - Driving to Rochdale or Rawtenstall in rush hour can increase a 20 to 30 minute journey to 1hr. - Access – If further development were to go ahead in the open fields we understand access will be via a narrow easement on Moorview. We suggest there are chance of problems and accidents with this narrow access point. There is also issue of narrow access for essential services. - It is also worth note that in winter and ice and snow many people are forced to park on Todmorden road as it become impossible to get up the steep hill to homes. Cars have to be

left near Bacup town centre and people struggle to walk up the steep hill to their homes. Any changes to the urban would increase this - The steep access road (Moorside Crescent) is so steep that it is at the maximum allowed nowadays. - Infrastructure - We have concerns if local facilities can cope with further development. Apart from poor transport and roads. We have always felt shopping opportunities are limited in Bacup. People seem to travel to Rawtenstall or Rochdale for food shopping. There seem limited opportunities for children's facilities. The local library offers very limited hours. We are not aware of GP and school capacity but feel this needs careful consideration - Housing strategy - Looking at the local plans to increase housing and what has already been built there seems an unusually high level of housing already built in Bacup without taking further green belt. - There are still various sites being developed around Bacup and empty land. - It seems looking at Rossendale as a whole there is much more housing being targeted at Bacup than other areas i.e. Haslingden, Rawtenstall, Whiteworth - - Over-provision - We have lived in Bacup for 20 years and with recent housing developments on the Rochdale Road area and other smaller sites we would question if too much housing is being generated in Bacup with no real demand. It's worth looking at the number of houses already around Bacup that cannot be sold. - -- We fear over developing housing at Bacup without a clear need may just lead to empty houses or empty fields half developed or empty fields marked for development and left vacant. All of which will further damage the economy of the local Bacup area.

Do you wish to participate to the Examination In Public? **No**

Reasons -

Reference **5104 Ms Fiona Knapper**

Number of supporters:

Commenting on **HS2** **H40**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Subject: Objection to proposal on local plan to build houses off Todmorden Road, Bacup

To whom it may concern,

This objection relates to the proposal to release land off Todmorden Road, Bacup (Housing allocation ref: H40, Policy: HS2, Reg. 18 ref: HS2.6, SHLAA ref: SHLAA16051; SHLAA16052 and SHLAA18419 per the Housing Topic Paper Rossendale Local Plan). I greet the inclusion of this proposed area with increasing disbelief and dismay. Unlike with the previous Local Plan, there doesn't seem to be any availability of an environmental impact report. One was produced last time, which clearly demonstrated the negative impact of building here, outside the urban boundary. Despite the fact that nothing has altered to diminish the importance of maintaining the site as it is, the proposed housing numbers have vastly increased. No explanation has been given for this terrible change. Having looked through the rest of the document, it appears that Greens Farm, off Todmorden Road has fallen victim to the 'it's in Bacup - just build on it' approach.

As the Rossendale council website has failed to show a new set of Strategic Housing Land Availability Assessments (SHLAA), I shall list my objections to developing the site off Todmorden Road using the original assessments (nothing has changed, so this must still be considered valid).

Vehicular access - the SHLAA grades this as a 3, presumably due to the fact that the developer will have to build a new road through the garden of an existing resident of Moor View. Ironically, the said resident will not only be losing half his garden to the development, which will be a 'major constraint' to their enjoyment of their garden, but will also lead to the development which will deprive them of the view their road name refers to! The SHLAA does not mention the positioning of the access to Moor View from Moorside Crescent. I believe this is an unacceptable oversight. The right turn into Moor View comes very quickly after turning a blind bend at the top of the very steep gradient of Moorside Crescent. In the original Local Plan, 20 new houses were proposed for this site, which was dangerous enough, but now the site is earmarked for 53 houses! If all those houses were occupied, that could mean an increase of over 100 cars making that right turn on a daily basis. Currently, there are only a handful of cars which turn into and out of Moor View. This increase would make Moorside Crescent an incredibly dangerous road, having a direct negative impact on the existing residents, many of whom, like myself, chose it because of it's quiet and safe environment.

This is a clear indication the the site off Todmorden Road is UNSUITABLE for housing allocation.

Distance to Strategic Highway Network - the SHLAA report itself grades this as a 0, due to the large distance from said Strategic Highway Network. Not only is Bacup, and Greens Farm, off Todmorden Road specifically, well away from useful transport links, but for each of the directions to centres of employment (Rochdale, Rawtenstall/Manchester, Burnley, Calderdale) there is only one road in each direction, which means that congestion levels are high and journey times are lengthy even before the traveller manages to get to the Strategic Highway Network. This makes Bacup unattractive to those who need to travel for their work, and impacts greatly on the housing market of the town. Given that there are no plans to mitigate the traffic flow of Bacup and therefore no prospects of this problems easing, building more houses will clearly compound this problem. This applies to all the proposed sites in Bacup, including Greens Farm, off Todmorden Road.

This is a clear indication that the site at Greens Farm, off Todmorden Road is unsuitable for housing allocation.

Access by public transport - the SHLAA graded this as poor, with only a 2, due to the only nearby bus service being one an hour to Todmorden or Rawtenstall, with no Sunday service at all. Since this SHLAA was produced, that bus service was withdrawn completely, and has since been only partially reinstated, with buses coming only every two hours. Combining this paucity of provision with the above mentioned issues with the road infrastructure (on which the buses must travel), it is clear that the available public transport would be of no practical use to those who need to travel for work, and little use for those who travel for recreation.

This is a clear indication that the site at Greens Farm is UNSUITABLE for housing allocation.

Proximity of services - whilst I acknowledge that there are services available within a reasonable distance from Greens Farm, the SHLAA fails to consider whether they have the capacity to accommodate the greater numbers of residents this new housing may generate. For example, of the two nearest primary schools it is my understanding that

Sharneyford is fully or almost fully subscribed, with no prospect for expansion. St.Mary's is not fully subscribed, but as a Catholic school it may not be suitable for parents who choose not to raise their children in that faith. Given that most of the further distant primary schools in Bacup are now fully, and in some cases over, subscribed, this will have a major negative impact on parents who live at Greens Farm.

With regards to secondary schools, the nearest school (still only graded 0 in the SHLAA) is a school in the worst category of special measures, which continues to fail. The next nearest school, Whitworth, is now over-subscribed, and the other schools in the valley are also fully subscribed and children from Bacup can only get in on appeal or through waiting lists. This means that any new residents to Bacup, including any at Greens Farm, would find it very difficult to access their right to a quality education for their children. In addition to this, the doctors' surgery in Bacup has very high patient numbers and the waiting times for a routine appointment are lengthy. This can only be exacerbated by adding more residents into Bacup, including adding more at Greens Farm.

These are further clear indications that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Ecological value - IT IS RIDICULOUS THAT GREENS FARM HAS BEEN GRADED 5 IN THE SHLAA AS HAVING NO ECOLOGICAL VALUE. 5 might describe a car park covered in concrete or Tarmac, but is utterly inappropriate for an area of nature, including grassland, protected trees and an abundance of wildlife. Penny Bennett, in the Life and Landscapes report describes the 'very attractive, tranquil site' and describes 'The site [being] enclosed by mature trees to the west and partially the North, and a copse of deciduous trees to the south-east'. The acknowledged natural beauty of the site in Penny Barrett's report is the principal reason that the original suggestion of building 60 houses was downgraded to 20, and yet it has now been bumped back up to 53. Outrageous!

In terms of wildlife, which has not been mentioned at all in either report, the site is the hunting ground for a significant number of bats and swallows, as well as badgers. There are owls living in the copse to the southeast, and there are frequent sightings of foxes, as well as a plethora of insect life which provide the food for the bats, swallows and, to a degree, the owls. Sacrificing this land to development would have an immediate and devastating impact on these animals, including the owls, badgers and bats which are species with national ecological importance.

This is a HUGE indication that the site of Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Recreational value - the SHLAA grades this as 5, having no recreational value. THIS IS SELF EVIDENTLY ENTIRELY UNTRUE. The Life and Landscapes report refers itself to walkers using the footpaths, and the major negative impact the development would have on them. The footpaths are used by walkers, runners and dog walkers (which has been considered as having recreational value for other sites in the SHLAA, which leaves me baffled as to its exclusion in the case of Greens Farm). As well as these direct recreational uses, the site is an area of beauty which has a pleasant and positive impact on the nearby residents, whose view it is, as well as the many walkers, cyclists, runners and dog walkers who regularly pass the site using Todmorden Old Road. This is a site which is a contributory factor to the quality of life of those who experience it, myself included, and to dismiss that as unimportant is disingenuous and frankly wrong.

This is another clear indication that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Landscape value - the SHLAA grades this as 3, making brief reference to the above mentioned recommendations by Penny Bennett, which reduced the size of the site. Penny Barrett's report clearly suggests that the upper site would be unacceptably spoiled by development, and that the lower site still would have moderate to major negative impact on various groups, including the residents and walkers ignored in the above recreational value category. It is unbelievable that these original suggestions, which were adopted in the last Local Plan (and were still not acceptable) are now being ignored again. I could find no map of the proposed 53 houses, but I assume the upper site is now being included again. This is unacceptable. THIS SITE IS A NATURAL, GREEN SITE, which is of great benefit to Bacup's character and history. It is part of our highly valued rural space, and is a particularly attractive example of it. This is supported by the fact that the site lies OUTSIDE THE URBAN BOUNDARY, a fact which is only mentioned as a minor consideration later in the SHLAA. The urban boundary is there to protect our local and national heritage and should not be considered dispensable just to fill a quota for a distant county council. This land matters to those who live here and it needs to be protected, both by us and by our local council.

This is a clear indication that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Overall site location and surroundings - the SHLAA describes the site as an 'Attractive site, surrounded by residential development and open space'. This is somewhat misleading. Only the lower boundary of the site has residential development. The remaining three quarters of the site is surrounded by the open space of which it is currently a part. This

reinforces that the site at Greens Farm is part of the countryside, which would be lost forever if it was given over to housing.

In addition, the SHLAA grades this site as 5 in this category, meaning that it is a popular residential location. It is true that the local residents, myself included, love living here, but those residents who wish to move away have found it difficult or impossible to sell their houses, due to the depressed state of the housing market. A number of houses on Change Close have been put on the market over the last decade, but only two have sold. The few that have sold on Rosemount have gone for less than market value. This does not support the grading as 'popular' because if that was true, the existing properties would sell well. This problem would be exacerbated by more properties built on the Greens Farm site, affecting both current residents and anyone who bought one of the new properties.

This is a clear indication that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Contamination/remediation or geological issues - the SHLAA has opted for a middle grading of 3 for this category, based on 'Possible issues resulting from previous bell mining works'. Surely this needed to be more certain that 'possible'? Mine workings under the site would cause a major issue for development, therefore these should have been fully investigated prior to making the decision about housing allocation. This is merely common sense. It is likely that Greens Farm, off Todmorden Road, will have mine workings below it, which will have a major negative impact.

This is another clear indication that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Key issues/constraints - a passing nod in the SHLAA to the issue of Greens Farm lying outside the urban boundary, therefore being part of Bacup's precious countryside.

According to the SHLAA, this is only worthy of an amber 'some constraints'. I disagree. I believe this is a serious decision to take, and that greenfield land should only be taken if there is a chronic housing shortage in the immediate area. There is demonstrably not any such shortage.

This is a clear indication that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Suitability - the report itself states that 'the impact on the landscape <must be> mitigated' but the Life and Landscapes report into Greens Farm, by Penny Bennett, states that all local residents, plus walkers using the existing footpaths will suffer between 'moderate' and 'major impact'. How can that be mitigated? This is an area described by Penny Bennett as a 'very attractive, tranquil site'. It is impossible that the impact of covering this with houses can be mitigated, therefore the statement taken from the SHLAA cannot be fulfilled.

Another issue identified in the SHLAA, but apparently ignored in the the conclusion, is that there are 'Potential geotechnical concerns that may result in exceptional costs'. This presumably relates to the existence of mine shaft and workings in this specific area. This is hardly a problem which can easily be dismissed. The animals which graze in the field, and the walkers who traverse it are unaffected currently,

but attempting to build houses on the site is likely to result in a great deal of additional work and potential danger. There will also be a risk of causing structural issues for the residences at Moorside Crescent, Change Close, Moor View and Rosemount, which lie below the site.

These are both clear demonstrations that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Viability - the SHLAA states that 'Greenfield sites in Bacup have a good prospect of viability'. I would be interested to see the evidence for this statement as I believe that this is demonstrably untrue. Housing stock sells very slowly in Bacup, in all areas, despite depressed housing prices well below the national average. This is clearly demonstrated by the new developments of Erin Rise and Woodlands Grange (both off Douglas Road, Bacup). These are modern houses, with all the expected features, but they have proven very difficult to sell resulting in a high number becoming rental properties instead - leading to a high number of transient tenants, which can only have a negative effect on local community cohesion. In addition to this, the properties which did sell have decreased in value, leaving their owners trapped in negative equity or having to take a significant loss if they have needed to sell their property. This is information which is readily available in the public domain - the Rightmove website and similar websites show what houses sell for, and what they sold for historically. Of the few that have managed to sell on those developments, plus the Pennine View development off Rochdale Road, the vast majority have decreased in value. There is absolutely no evidence that properties built on Greens Farm, off Todmorden Road, would sell any more effectively, or retain their value. This will make them unattractive to potential buyers, no matter how nice the houses are.

This is another clear indication that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Viability - the SHLAA states that Keppie Massie's draft viability report suggests that 'Greenfield sites in Bacup have good prospect of viability'. Given that this reports has not, to

the best of my knowledge, been shared with the public during the public consultation period, I have not been able to read the evidence from which this conclusion was drawn. However, I refer you to my numerous arguments stated in the sections above, which clearly demonstrate that almost NO housing is viable in Bacup is viable, due to the depressed housing market, poor infrastructure and little/no prospect of that changing. Bacup is a small town, and due to the previously explained challenges, needs to remain a small town as it simply doesn't have the infrastructure to grow.

This is another clear indication that the site at Greens Farm, off Todmorden Road, is UNSUITABLE for housing allocation.

Allocation - the SHLAA has coloured this green and recommended that Greens Farm be allocated for housing. I strongly oppose this for all the above reasons. There are areas in Bacup which are in need of development, and despite the absence of demand for housing, houses built there would be better than the derelict sites that currently exist. However, Greens Farm is not one of these sites. The fact that it is more easily obtained (due to a single owner, living abroad, who has no interest in the land other than as a cash cow) does not justify spoiling forever an area of beauty and tranquillity which currently enhances our town. I urge the planning committee to take the long view and recognise that allocating Greens Farm, off Todmorden Road, to housing would ultimately be a decision which would be regretted, and Bacup would have lost a precious asset. I have listed, using the SHLAA's own categories, a great many reasons for allowing Greens Farm, off Todmorden Road, to remain in its current, beautiful, tranquil state. I hope that the decision makers will consider my objections carefully.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5197 Mr Marcus Hudson Lancashire County Council** Number of supporters:
Commenting on H40

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS2.6 – Greens Farm – Subject to vehicular access being secured via the Moorside Crescent Estate and designed in accordance with MfS to maximise permeability and distribute traffic throughout the estate, the site access would be acceptable.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H41

Reference **102 mr alan boon** - Number of supporters:

Commenting on chapter i policicy hs22 hs18 H41

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

with relation to the areas named my objections are the followingthere is loss of amenities in particular to arears H29 and H41 these arears are well used by all residents surrounding those areas they are used for dog exercising as required under the animal welfare act, these areas are used by local children keeping them of the busy estate streets.these areas are used by local residents for walking and relaxing.these areas are used by the many horse owners keeping them off the roads and are used as access routes to bridleways that surround Bacup loss of these trails will lead to horses being exposed to busy roads and inevitably will increase the danger therefore reducing the amount of young riders able to enjoy the bridleways.in particular H41 currently houses 3 areas of use area 1 is a purpose built football/basketball pitch. Area 2 is a children's playground area 3 is a gated garden area with benches whilst an area is to be allegedly prepared after this loss it is unlikely to accommodate all 3 and is not guaranteed to builtthe houses proposed will lead to a vast increase in density of housing giving an unacceptable increase in motor traffic with an inevitable increase in children playing in the roads the danger of serious accident is increases in an area that already has an issue with traffic.the infrastructure in which the proposed houses are situated is totally unsuited to an increase in houses, doctors and schools are currently operating to near capacity the proposed houses would give an approximate increase of 25% in need for these facility's.an increase of 25% traffic in such a small area could be considered dangerous in what is essentially currently a already busy estate the area of Bacup is scheduled to accommodate 25% of the total housing being built in Rossendale changing forever the landscape for the people of Bacup this is clearly disproportionate to the needs of Rossendale as a whole.

scrap the plans in particular H29 & H41and revise the plan H37

Do you wish to participate to the Examination In Public? **No** Reasons to be given the oppportunity to explain more fully my objections

H42

Reference **83 Mr Christopher Dance** - Number of supporters:
 Commenting on Appendix E: SHLAA16070, SHLAA16071 - H42

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Sound evidence supplied in response to the draft consultation document (Appendix E - Site Assessments), issued in 2017, demonstrating it was factually inaccurate has been totally ignored in the 2018 document in relation to the 2 sites I objected to in 2017: Appendix E - SHLAA 16070 Land to the south of the Weir HotelSite location - "Countryside adjoining urban area"Landscape value - "low landscape impact". This statement is factually inaccurate. This field is the last area of land open on both sides of the A671 to separate the village of Weir from Bacup. The village has a distinct and separate identity from Bacup and every Weir resident I have spoken to has no wish to become part of "Greater Bacup" by this last open space being lost. I note that the councilors who approved this plan to go forward requested "That this Council ask the Planning Inspector to give full and due consideration to the local community plan in relation to Edenfield". Why is it that the councilors feel that an exception could be made to protect the village identity of Edenfield, yet not give the same consideration to the village of Weir at the opposite end of Rossendale? A cynic might surmise that NIMBYism played a part.Topography - "Flat site or very gentle slope". Photgraphic evidence supplied by me shows this statement to be ridiculous, yet my evidence has been totally ignored and the same assessment has been made in the 2018 edition.Vehicular access - "Good access or adjacent to road". While it may be adjacent to a main road (A671) access onto this road would be onto the concave side of a distinct bend in the road which would make the emergence of vehicles onto the A671 dangerous, particularly at the beginning and end of the school day at Northern Primary School, as vehicles already park all the way along the edge of the road adjacent to this site, making it a danger to any vehicle attempting to emerge from this proposed site and the children walking down to the school from the village. The recent death of an 11 year old girl outside a school in Rochdale at the end of the school day illustrates that road safety concerns of parents (and in my case grandparents) relating to pupils at Northern School are well founded.Access to primary school - "515 metres to Northern Primary School". This statement completely ignores the fact that the reception class at the school was oversubscribed. As the admissions policy for the school, along with other criteria, allocates places to parents according to distance from the school, parents from this proposed housing would have priority to those at the northern end of the village (being closer), leading to the ridiculous potential situation of parents from the Moorlands estate having to drive past the village school in order to get their child to an alternative.Flood risk - "Flood zone 1 or low flood risk". Again, evidence to the contrary was ignored. In the winter, the amount of water running across this land is so great that it forms large lagoons behind the stone wall/earth barrier (effectively a dam) that runs across the site. In wet weather, water currently also floods out onto the A671 from this land. Hard landscaping in the form of roads and pavements which would slope significantly down to the A671 (see above) would only enable this water to flow more quickly, increasing the problem. One wonders if the person making the assessment regarding slope and flood risk merely viewed it from the road and so could not see what the situation was on the other side of the land which would be out of view from the roadAppendix E - SHLAA 16071 - Land west of Burnley Road, Weir Access to primary school - "750 metres to Northern Primary School". This statement completely ignores the fact that the reception class at the school was oversubscribed. As the admissions policy for the school, along with other criteria, allocates places to parents according to distance from the school, parents from this proposed housing would have priority to those at the northern end of the village (being closer), leading to the ridiculous potential situation of parents from the Moorlands estate having to drive past the village school in order to get their child to an alternative.Vehicular access - "Poor access off Burnley Road via Deer Street that would need to be improved. Poor access via a narrow lane leading to no. 4 Doals House. Possible access from Hill Side Crescent subject to ransom strip".This statement is factually inaccurate. There have already been a number of accidents at the entrance to Hillside Crescent. Last year, I supplied photographic evidence of the unsuitability of Hillside Crescent as a possible access to this site which would double the number of vehicles emerging onto the A671 at this point. The photographs showed that when emerging from Hillside Crescent, with the front bumper of the car at the white line, it is not possible so see what is travelling down the hill in a southerly direction for more than a few metres. Even if drivers were adhering to the 30mph limit, one would have only a split second to react. One has to wait till there is a gap in the traffic travelling north, then stick the front of the car out into the road in order to try and get an improved view of traffic travelling south. If there is traffic travelling south, one often has to reverse back into the opening of Hillside Crescent (hoping

that no-one behind you has drawn forward to the rear of your car, which is more likely with double the number of vehicles) in order to allow further traffic travelling north to pass, and repeat the whole manoeuvre again. This is not the case at Deer Street, as there is a clear view to the north, and the view to the south is better than the northward view from Hillside Crescent. This evidence was ignored and went forward to the 2018 Appendix E unamended. If Rossendale Council goes through the process of publishing Draft proposals in order to allow residents to comment/object to them, and then totally ignores sound evidence which refutes statements made in the evidence base (in this case Appendix E) and allows these inaccurate statements to go forward into the final document, it makes a mockery of the process and in my view, they are merely paying lip service to their obligations regarding consultation and therefore this consultation was not "Sound" and does not comply with the duty to co-operate. Residents have spent a great deal of time and effort over this plan. I myself have attended two consultation meetings at the council as well as 2 residents meetings and time spent in making detailed points in my objections. When clear evidence of inaccurate information in the evidence base has been supplied, yet the draft plan goes forward unmodified, how can the council claim it is compliant and sound?

"Sound" surely implies that the evidence base is accurate and that inaccuracies have been corrected before the final document goes forward. What evidence is there that the council have: 1) examined every point made in the responses to the Draft proposal 2) corrected inaccuracies in the evidence base? Do we just have to accept their word that these have happened? I cannot speak for others but, I have no evidence that my efforts have been considered and acted upon; quite the contrary in fact. I have no faith in this process and until inaccurate information is corrected, I do not feel that it can be considered a "sound" plan. How can a decision be fairly made on the basis of inaccurate information. Suggested revisions: Appendix E - SHLAA 16070 Land to the south of the Weir Hotel Site location - "Countryside adjoining urban area" Landscape value - "High landscape impact". That the residents of Weir ask the Planning Inspector to give full and due consideration to the local community plan in relation to Edenfield and Weir.

Topography - "Significant slope". Vehicular access - "Dangerous access". Access to primary school - "515 metres to Northern Primary School though this school is oversubscribed". Flood risk - "Regularly floods in winter". Appendix E - SHLAA 16071 - Land west of Burnley Road, Weir Access to primary school - "750 metres to Northern Primary School though this school is oversubscribed". Vehicular access - "Poor access off Burnley Road via Deer Street that would need to be improved. Poor access via a narrow lane leading to no. 4 Doals House".

Do you wish to participate to the Examination In Public? **Yes**

Reasons I feel strongly that points I have made have been ignored by the council officers (and therefore councilors based their approval on inaccurate information) and that to have any faith in the process, I want them to justify the fact that inaccuracies have not been amended.

Reference **5017 Ms**

Ann

Grimes

Number of supporters:

Commenting on

HS2

H42

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

In the first instance, it is apparent that the Local Authority fail to provide adequate promotion of then proposal, culminating in an inevitable last gasp submission. Notwithstanding, the council granted planning permission (in respect of the adjacent Weir Hotel development) despite numerous identified detrimental flaws, & valid objections (together with legitimate environmental and safety concerns) all of which were made apparent prior to permission being granted. Aspects of the plans approved are erroneous, and cannot be achieved – consequently there needs to be accountability prior to any further permission being established. Additionally, previous traffic surveys misrepresent the actual volume of traffic incurred and a proposal of this nature would render the situation unacceptable. Local amenities cannot sustain the current demand. For example, Weir Primary School is oversubscribed, (which in addition creates hazardous traffic conditions each day at school times). A situation which this proposal would considerably compound. Furthermore, in an attempt to mitigate expense, the council consider (interalia) local council supported Nursery facilities should be closed, thus reducing necessary amenities needed to accommodate a substantial increase in demand. Evidence of historic mining activity in the immediate vicinity, (of the proposed development) precludes development pending verification from relevant authorities. In short this proposal is in its current form untenable.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

H43

Reference **83 Mr Christopher Dance** - Number of supporters:

Commenting on Appendix E: SHLAA16070, SHLAA16071 H43

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Sound evidence supplied in response to the draft consultation document (Appendix E - Site Assessments), issued in 2017, demonstrating it was factually inaccurate has been totally ignored in the 2018 document in relation to the 2 sites I objected to in 2017: Appendix E - SHLAA 16070 Land to the south of the Weir HotelSite location - "Countryside adjoining urban area"Landscape value - "low landscape impact". This statement is factually inaccurate. This field is the last area of land open on both sides of the A671 to separate the village of Weir from Bacup. The village has a distinct and separate identity from Bacup and every Weir resident I have spoken to has no wish to become part of "Greater Bacup" by this last open space being lost. I note that the councilors who approved this plan to go forward requested "That this Council ask the Planning Inspector to give full and due consideration to the local community plan in relation to Edenfield". Why is it that the councilors feel that an exception could be made to protect the village identity of Edenfield, yet not give the same consideration to the village of Weir at the opposite end of Rossendale? A cynic might surmise that NIMBYism played a part.Topography - "Flat site or very gentle slope". Photgraphic evidence supplied by me shows this statement to be ridiculous, yet my evidence has been totally ignored and the same assessment has been made in the 2018 edition.Vehicular access - "Good access or adjacent to road". While it may be adjacent to a main road (A671) access onto this road would be onto the concave side of a distinct bend in the road which would make the emergence of vehicles onto the A671 dangerous, particularly at the beginning and end of the school day at Northern Primary School, as vehicles already park all the way along the edge of the road adjacent to this site, making it a danger to any vehicle attempting to emerge from this proposed site and the children walking down to the school from the village. The recent death of an 11 year old girl outside a school in Rochdale at the end of the school day illustrates that road safety concerns of parents (and in my case grandparents) relating to pupils at Northern School are well founded.Access to primary school - "515 metres to Northern Primary School". This statement completely ignores the fact that the reception class at the school was oversubscribed. As the admissions policy for the school, along with other criteria, allocates places to parents according to distance from the school, parents from this proposed housing would have priority to those at the northern end of the village (being closer), leading to the ridiculous potential situation of parents from the Moorlands estate having to drive past the village school in order to get their child to an alternative.Flood risk - "Flood zone 1 or low flood risk". Again, evidence to the contrary was ignored. In the winter, the amount of water running across this land is so great that it forms large lagoons behind the stone wall/earth barrier (effectively a dam) that runs across the site. In wet weather, water currently also floods out onto the A671 from this land. Hard landscaping in the form of roads and pavements which would slope significantly down to the A671 (see above) would only enable this water to flow more quickly, increasing the problem. One wonders if the person making the assessment regarding slope and flood risk merely viewed it from the road and so could not see what the situation was on the other side of the land which would be out of view from the roadAppendix E - SHLAA 16071 - Land west of Burnley Road, Weir Access to primary school - "750 metres to Northern Primary School". This statement completely ignores the fact that the reception class at the school was oversubscribed. As the admissions policy for the school, along with other criteria, allocates places to parents according to distance from the school, parents from this proposed housing would have priority to those at the northern end of the village (being closer), leading to the ridiculous potential situation of parents from the Moorlands estate having to drive past the village school in order to get their child to an alternative.Vehicular access - "Poor access off Burnley Road via Deer Street that would need to be improved. Poor access via a narrow lane leading to no. 4 Doals House. Possible access from Hill Side Crescent subject to ransom strip".This statement is factually inaccurate. There have already been a number of accidents at the entrance to Hillside Crescent. Last year, I supplied photographic evidence of the unsuitability of Hillside Crescent as a possible access to this site which would double the number of vehicles emerging onto the A671 at this point. The photographs showed that when emerging from Hillside Crescent, with the front bumper of the car at the white line, it is not possible so see what is travelling down the hill in a southerly direction for more than a few metres. Even if drivers were adhering to the 30mph limit, one would have only a split second to react. One has to wait till there is a gap in the traffic travelling north, then stick the front of the car out into the road in order to try and get an improved view of traffic travelling south. If there is traffic travelling south, one often has to reverse back into the opening of Hillside Crescent (hoping

that no-one behind you has drawn forward to the rear of your car, which is more likely with double the number of vehicles) in order to allow further traffic travelling north to pass, and repeat the whole manoeuvre again. This is not the case at Deer Street, as there is a clear view to the north, and the view to the south is better than the northward view from Hillside Crescent. This evidence was ignored and went forward to the 2018 Appendix E unamended. If Rossendale Council goes through the process of publishing Draft proposals in order to allow residents to comment/object to them, and then totally ignores sound evidence which refutes statements made in the evidence base (in this case Appendix E) and allows these inaccurate statements to go forward into the final document, it makes a mockery of the process and in my view, they are merely paying lip service to their obligations regarding consultation and therefore this consultation was not "Sound" and does not comply with the duty to co-operate. Residents have spent a great deal of time and effort over this plan. I myself have attended two consultation meetings at the council as well as 2 residents meetings and time spent in making detailed points in my objections. When clear evidence of inaccurate information in the evidence base has been supplied, yet the draft plan goes forward unmodified, how can the council claim it is compliant and sound?

"Sound" surely implies that the evidence base is accurate and that inaccuracies have been corrected before the final document goes forward. What evidence is there that the council have: 1) examined every point made in the responses to the Draft proposal 2) corrected inaccuracies in the evidence base? Do we just have to accept their word that these have happened? I cannot speak for others but, I have no evidence that my efforts have been considered and acted upon; quite the contrary in fact. I have no faith in this process and until inaccurate information is corrected, I do not feel that it can be considered a "sound" plan. How can a decision be fairly made on the basis of inaccurate information. Suggested revisions: Appendix E - SHLAA 16070 Land to the south of the Weir Hotel Site location - "Countryside adjoining urban area" Landscape value - "High landscape impact". That the residents of Weir ask the Planning Inspector to give full and due consideration to the local community plan in relation to Edenfield and Weir.

Topography - "Significant slope". Vehicular access - "Dangerous access". Access to primary school - "515 metres to Northern Primary School though this school is oversubscribed". Flood risk - "Regularly floods in winter". Appendix E - SHLAA 16071 - Land west of Burnley Road, Weir Access to primary school - "750 metres to Northern Primary School though this school is oversubscribed". Vehicular access - "Poor access off Burnley Road via Deer Street that would need to be improved. Poor access via a narrow lane leading to no. 4 Doals House".

Do you wish to participate to the Examination In Public? Yes

Reasons I feel strongly that points I have made have been ignored by the council officers (and therefore councilors based their approval on inaccurate information) and that to have any faith in the process, I want them to justify the fact that inaccuracies have not been amended.

H47

Reference **60 Mrs Natalie Hutton** -

Number of supporters:

Commenting on - - H47

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

the local roads/ schools/ doctors/ dentist simply cannot cope with the numbers that you are suggesting. I also feel that the idea you could build houses on the land behind Kirkhill Avenue ridiculous, I live on Kirkhill Avenue and we already have a huge problem with the water that runs down from the hills, if you visit this particular spot during December you will notice that there are now three streams of water that run down continuously. I think I am correct in saying that this water has actually caused Kirkhill Road to dip. I don't think it is 'sound' to allow building on land which has a known water problem.

I would take out the land behind Kirkhill Avenue, keeping it as Greenbelt land due to the reasons above.

Do you wish to participate to the Examination In Public? **No** Reasons -

H5

Reference **30 Ms Sally Dewhurst** - Number of supporters:

Commenting on - HS5: Swinshaw Hall H5

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

As a resident I know the area well and I wish to register my objection on the grounds detailed below. Whilst I am aware of the requirement for Rossendale Borough Council to provide a housing plan committing to the provision of 3,180 houses over the next 15 years the proposal for use of land in Loveclough is inappropriate, excessive and ill-advised. Government policy is to develop Brownfield sites first. However, within the local plan Brownfield sites have been allocated for development within 6-10 years (e.g. H36) whilst Greenfield sites (e.g. H5 Swinshaw Hall) have been allocated within the first 5 years. The plan needs to allocate each site in an order of priority for development, with all Brownfield sites to be developed first, before Greenfield land can be touched to ensure that the Rossendale countryside is preserved until it is absolutely necessary to develop these sites. This is critical in preventing developers from 'cherry picking' the easiest, most economically viable and picturesque sites whilst improving Rossendale through development of Brownfield sites. Rossendale planners have stated at a local meeting for residents that Brownfield sites are less attractive to developers as they are generally less economically viable. However, if housing demand in the area is there as suggested by the figure of 3,180 houses then this should not be considered a factor. In addition to the H5 Swinshaw Hall site the Local Plan also includes proposals for developments at H4, H6, H7, H13 and H17 within Loveclough. In total this equates to 175 houses being built within the village and would be destructive to the character and nature of the area. The infrastructure of the area cannot cope with such additions and the Council infrastructure delivery plan itself offers no solutions or agreements for funding. The road network cannot support the additional volume of traffic and the A682 Burnley Road is already a busy main road with further traffic having commuting, environmental and safety implications. The proposal of 175 houses within Loveclough would create up to an additional 350 cars using this road on a daily basis mainly travelling towards Rawtenstall and Manchester. The additional cars using Burnley road must also be factored in from the proposed developments at sites H11, H12, H15 and H16, i.e. a further 208 houses / 400 cars. All this extra traffic plus traffic from other areas in the Local Plan would intensify the bottleneck at the Rawtenstall Gyratory. Indeed the Council's own operational assessment of this junction highlights that 'very significant operational issues are expected to occur'. Furthermore, the geography of the area prevents any upgrading or expansion of the A682. A recent report in September 2018 by the National Infrastructure Commission identified Rossendale as having the worst traffic congestion in the country excluding cities as highlighted in the Rossendale Free Press on 13th September 18. This cannot be ignored or taken lightly. As a resident who works in Manchester there are already considerable commuting issues. In the morning it is normal to be caught in slow moving traffic from the start of the A56 (just past M&S at New Hall Hey). To add 3,180 homes in Rossendale and potentially 6,000 cars to the area, the vast majority of which would be travelling towards Manchester as the main source of work for the area, would make commuting even more delayed. There are no practical alternatives for residents to use public transport with no rail network and the X43 bus from Loveclough gets caught in the same traffic. Crawshawbooth primary school is at capacity and has already had to impose a geographical priority area. The additional housing could result in 350 more children in the village and a doubling in the size of school needed. Traffic around the school is already extremely dangerous for the children at the start and end of the day with no dedicated area for parents to park. There is no plan of how to resolve or fund these significant issues at a time of severe Council and National austerity and budget cuts. The area where the H5 site meets Burnley Road is known for flooding problems. The water floods off the existing estate, i.e. Hameldon Road, and from the Greenfield H5 site. If the H5 site was built upon it would remove the natural drainage of the area and exacerbate this issue. The development would increase pressure and demand on all other existing overburdened infrastructure, e.g. sewerage. The development of 175 houses in Loveclough would need medical and dental provision for potentially 800 further residents. At a meeting with Rossendale local planners and residents we were informed that there are 1,400 vacant houses in the area. Whilst we were informed that these cannot form part of the Local Plan I would emphasise that it does highlight the lack of demand for housing in the area and it is reckless to destroy an area of considerable natural beauty around H5 Swinshaw Hall whilst having these properties vacant in the area. I urge that all the above be taken into account when reaching a final decision on site H5 Swinshaw Hall and that steps are taken to prevent what would almost certainly result in a serious deterioration in amenities and the environment and result in significantly overburdened infrastructure.

If site H5 Swinshaw Hall is to proceed even after addressing these legitimate objections I would like to highlight the following modifications to policy HS5 Swinshaw Hall: Under

the section on Design Code point 'e' to be updated to read: 'Layout considerations to include development in keeping with the surrounding buildings, e.g. single storey bungalows, and suitable screening and distancing between existing and proposed developments. Under the section on Design Code include a further point: 'Restrictions to be placed upon the hours of construction for the consideration of existing residents' Under the section on phasing and infrastructure delivery point 'h' around school provision: Remove the wording (if identified as necessary). Funding towards school provision would be critical for any development to proceed. Under the section on phasing and infrastructure delivery add in: Funding of a comprehensive junior playground at Loveclough Park by the developer.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **87 Miss Lauren Green** - Number of supporters:

Commenting on - - H5

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Due to the location of houses being proposed For the second field in off Goodshaw Lane I do not think it is a sound plan. My house boundary backs into this field and my boundary wall is the wall that holds this field in place. The wall is at least 13 ft high if not more and is a very old dry stone wall that has not been altered. Building on this field would make this wall insecure and unsafe. Also if you build houses there, there would be a considerable amount of light taken away from our yard which is already limited to light due to the wall and field. I feel this is unfair to us and not a sound plan

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5122 Mr Ken Ainsworth** - Number of supporters:

Commenting on HS2 H5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The land that I put forward, off Goodshaw Lane, to be included in the local plan, was for the possibility of building bungalows as I believe there is a shortage of supply in the area. Therefore, the older residents would be able to remain in the area and the houses would then become available for the younger generation.

I understand the concerns of some of the LVRA members not wanting large detached properties built in the village.

Access could easily be provided by widening the entrance to Goodshaw Lane.

Regards,

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5197 Mr Marcus Hudson** Lancashire County Council Number of supporters:
Commenting on H5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS2.47 – Goodshaw Lane/Swinshaw – A new / widened access off Burnley Road appears achievable to include potentially the private access to Broad House and secondary/emergency, pedestrian/cycle access onto Goodshaw Lane should be provided.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H50

Reference **51 Miss Judith Lord** - Number of supporters:
Commenting on H50 H50

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Subject: Planning 10337 H50Land off Park Avenue HaslingdenWe live on the estate at the bottom and have had no letter of notification with regards to this sizeable development. Park Avenue is already barely passable at times due to parked cars and traffic. The road isn't gritted in winter making it a danger to both road users and pedestrians. If houses are proposed to go on this site it would exasperate access problems further for existing residents and also access for emergency vehicles.This land currently acts as a soak away for rain and surface water, building on it could cause a potential flood risk to existing properties below. This problem seems to be happening throughout the valley due to short sighted planning decisions that often benefits the council financially.I would be grateful for more details of this proposal as I am sure would all other residents concerned. Regards Judith Lord and Darren Prime

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Do you wish to participate to the Examination In Public? **No** Reasons -

H52

Reference **5140 Ms Jane George**

Number of supporters:

Commenting on

H52

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

ROSSENDALE LOCAL PLAN PRE-SUBMISSION VERSION CONSULTATION

I am a resident of Private lane, Haslingden and have been for over 20 years. This letter comprises my representation to Rossendale Borough Council (RBC) regarding the Pre-Submission Draft of the Rossendale Local Plan (RLP) which is currently the subject of public consultation. It also provides comments on other relevant "background documents" which comprise the supporting evidence for the RLP.

I currently live adjacent to Haslingden Cricket Club (HCC). The club has been located at its current location since its foundation in 1853. The club is a founder member of the Lancashire Cricket League, one of the most prestigious amateur cricket leagues in the country. HCC is a focal point in the community and the only cricket club in Haslingden and Helmshore and is used by local teams and other sections of the community for the purposes of cricket development such as local secondary and primary schools.

The entire Cricket Club site is currently allocated as Greenland (E.1) and Recreation Area (E.2) within the Rossendale Core Strategy (RCS) (2011). RBC's Strategic Housing Land Availability Assessment (SHLAA) assesses the site under SHLAA reference: 16284. The SHLAA identifies that the site is in active use as Open space, cricket practice area and car park area adjoining Haslingden Cricket Club (HCC).

My representation relates to proposed allocation H52 - Land to the rear of Haslingden Cricket Club. Appendix 4 of the RLP identifies 0.75ha as capable of delivering 30 dwellings within 5 years. The remainder of this representation explains why proposed allocation H52 does not comprise a deliverable or developable site in accordance with the requirements of the National Planning Policy Framework (NPPF) and should therefore not be allocated within the RLP.

Policy Context

The NPPF provides the policy context for the emerging Local Plan. In this regard, insofar as its policies are relevant to this representation. Paragraph 96 states that: "Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."

Paragraph 97 identifies that:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."

Paragraph 127 requires that planning policies and decisions should ensure that developments:

- "a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime

and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”

The Glossary to the revised NPPF provides a definition of ‘deliverable’ which requires that:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.

The Glossary to the NPPF also provides a definition of ‘developable’ which requires that:

“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.

The Planning Practice Guidance (PPG) states:

“Strategic policy-making authorities will need to provide robust, up to date evidence to support plan preparation. Their judgments on deliverability of housing sites, including windfall sites, will need to be clearly and transparently set out”.

Existing use

The area proposed for development and identified within the SHLAA and Proposed Proposals Map is currently used as car-parking, open space and as a practice area. These uses will be considered in turn.

Open Space and Practice Area

Paragraph 97 of the NPPF clearly identifies that an assessment needs to be undertaken to demonstrate that sport’s facilities are surplus to requirement to facilitate the development of the land.

The Rossendale, Pendle & Burnley Playing Pitch Strategy (2016) provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities between 2016 and 2026. The Playing Pitch Strategy considers the existing scenarios for Sports facilities across the area and identifies that the existing quantity of grass wicket pitches should be protected.

The Playing Pitch Strategy provides specific analysis for Haslingden Cricket Club as can be seen below:

The strategy clearly concludes that this facility needs to be protected and enhanced.

The Playing Pitch Strategy identifies that there is a single practice pitch; this was located in the north western corner of the facility to the west of the car park. This practice pitch is located next to my house and I can confirm that it was used for a significant period of time; the practice pitch was not maintained and has not been used in the recent past.

This land does however, comprise land which is capable of being used for practice areas as it has been in the past.

Prior to the assessment being undertaken HCC submitted application reference 2012/266 in May 2012 for the construction of artificially-surfaced cricket nets, to provide 8 sets of wickets in 4 lanes. The site location plan can be seen below:

The application for the practice nets was approved on 24 July 2012 and practice facilities have now been delivered.

The Council’s committee report in relation to application reference: 2012/266 provides the following description of the site:

“Haslingden Cricket Club is accessed via a Private Lane off Broadway, Haslingden. It consists of a with a cricket pitch towards the east and a 2-storey club house, parking and other outbuildings towards the west end. To the south and west of the club house is a grassed area used for practice purposes, which is bounded by the rear gardens of residential properties fronting Grasmere Road, with boundary treatments consisting of timber panel fencing and trees / shrubs.”

It is clear from the description and application above that the proposed development area comprises uses essential to the running of the cricket club and predominantly land which is used for either practice purposes or car parking. The entire site therefore accords with the definition of ‘Playing Field’ used by Sports England and included within the Glossary of the NPPF:

“Playing Field: Means the whole of a site which encompasses at least one playing pitch. The reference to ‘the whole of a site’ applies to all areas of a playing field not just those which happen, for the time being, to be laid out as pitches”

Sport England is a statutory consultee on planning applications affecting playing field land (as set out in SI2010/2184 (The Town & Country Planning (Development Management Procedure) (England) Order 2010). This policy states that: Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, or land last used as a playing field or land allocated for use as a playing field in an adopted or draft deposit plan, unless, in the judgement of Sport England, specific circumstances apply.

It has been identified in this representation that the land proposed as allocation H52 is in use and allocated as playing field land.

The five specific exceptional circumstances where Sport’s England will not object to a planning application are identified as:

“E1: A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.

E2: The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.

E3: The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing areas of any playing pitch or the loss of any other sporting/ancillary facilities on the site.

E4: The playing field or playing fields, which would be lost as a result of the proposed development, would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development.

E5: The proposed development is for an indoor or outdoor sports facility, the provision of which would be of artificial sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields. Sport England’s policy statement is in line with the requirements of the NPPF (para 74) in relation to the protection of sports facilities.

The loss of the car park, practice areas and open space would comprise the loss of sporting/ ancillary facilities as well as land which could be made into practice facilities. The loss of this land would affect the use of the club as it would restrict the practice facilities at the club and the club would lose the car park which is fundamental to HCC’s ability to function in this location. This therefore indicates that there is no specific circumstance to identify that Sport’s England would approve of the proposed development.

Paragraph 97 of the NPPF clearly identifies that an assessment needs to be undertaken to demonstrate that sport’s facilities are surplus to requirement to facilitate the development of the land. An assessment of the site has been undertaken within the Council’s playing pitch strategy and it has been clearly identified that all Cricket Pitches within the Borough should be retained, with Haslingden Cricket Club specifically being identified as a club which should be retained and expanded. The proposed allocation of H52 is contrary to the recommendations of the playing pitch strategy and contrary to the provisions within Paragraph 97 of the NPPF. This is a conclusion which has clearly been reached by RBC within their SHLAA report which states the following:

“The site is available although the south-eastern corner has a planning permission for a cricket practice area and the northern part is currently used as a car park for the cricket club. The site is suitable for a housing development subject to Sports England and Highways agreements due to concern on cricket pitch availability in the Borough and loss of car parking.”

It is therefore clear that RBC’s own evidence identifies that the site is not currently developable as the agreement of Sport’s England and Highways has not been provided and it has been identified within this representation that Sport’s England’s policies indicate that the proposals would be subject to an objection. H52 is therefore not available and its allocation within the RLP is unsound.

Car-Park

HCC’s car park is located to the north-east of the site and has been expanded recently to accommodate an increased number of patrons. On match days and when the club hosts

events the car park is filled to its full capacity as is evidenced within the photos appended to this representation.

The car park is used as an ad-hoc 'fair ground' during HCC's annual Bonfire Night event (which HCC have hosted for over 15 years). Due to the loss of the parking facility for this event, HCC has to place marshals at the entrance to Private Lane ensuring only vehicles of residents' enter the road. It is necessary for HCC to do this, as without the car-park there is limited space for vehicles to turn or park on Private Lane and the event causes increased pedestrian footfall. The removal of the car-park permanently, as is proposed within the RLP, would necessitate this type of solution on all match days and events. A parking solution such as this would be detrimental to the amenity of local residents on Private Lane and be a significant monetary drain for the management of the club. The permanent removal of the car park would create/ worsen parking issues on the surrounding residential streets, as it would force patrons to park elsewhere. The loss of this car park and development of the HCC site would therefore be contrary to Paragraph 127 of the NPPF as the proposal would not function well immediately or for the lifetime of the development and would have a detrimental effect to residential amenity. This is a conclusion which has clearly been reached by RBC within their SHLAA report which states the following:

"The site has a planning permission for a cricket practice area. The Playing Pitch Strategy indicates that all cricket facilities should be retained, therefore the development is subject to Sports England agreement. The remaining part of the site appears suitable for housing development, although if the development occurs on the car park it can lead to highway issues in terms of access and safety. The vehicular access to the site is also via a private lane which restraints the access. The site is considered suitable for housing development subject to Sports England and Lancashire County Council Highways agreement."

RBC's own evidence identifies that the site will be "suitable in medium to long term". The site is evidently not suitable in its current form and therefore is not developable in accordance with the NPPF's definition. The site is therefore not available and the allocation of the site within the RLP is unsound.

The loss of the car park may also have an impact on the future of HCC, though the sale of the land to a developer may provide short term monetary gains, it would limit the future expansion of the Club and limit the size and nature of events it can host. The NPPF clearly advocates for the protection of retention of sporting facilities such as HCC and the important role and function a historic club such as this plays in the health, well-being and social cohesion of the community.

Vehicular Access

The SHLAA identifies that the access to the site via Private Lane is narrow and states that this is a 'major constraint' to development. The SHLAA fails to identify that Private Lane comprises a single track road with a 'token' 0.5m pavement along the southern side. The land along the entire northern boundary of Private Lane is within third party ownership. The land to the south east of Private Lane, comprises my land and another residential property in private ownership. The road narrows at the entrance to Private Lane and is also within third party ownership on both sides and subsequently the lane could not be widened to accommodate the increased quantum of development as required and identified within the SHLAA.

The access on to Private Lane from Broadway via Grasmere Road requires that a driver navigate a blind bend on to a single track road. This often requires the driver entering Private Lane to wait for other vehicles to exit the road. The vehicles waiting have to wait on a small hill at the junction with Broadway; during peak times this can cause traffic to back up to the bus stop on Broadway. This creates a significant hazard as during peak times the junction between Broadway, Grasmere Road and Private Lane is congested by ad-hoc parking for school drop off and pick up and Private Lane is used by many pupils of Haslingden High as a cut through on the way to and from school. This increases the level of traffic and congestion in this location and reduces visibility. A development of 30 dwellings would more than double the number of dwellings on Private Lane (23 currently) and therefore significantly increase the level of traffic and increase the risk of accidents for both pedestrians and vehicles.

Due to the access constraints the site is not considered to comprise a 'suitable' location for development as required by the NPPF and subsequently cannot be considered deliverable or developable.

Development Quantum

Proposed allocation H52, as stated previously, is identified as a 0.74ha piece of land capable of delivering 30 dwellings by 2023. This comprises a proposed development density of 41 Dwellings per Hectare (DPH).

The SHLAA identifies that the net developable area is 0.45ha and proposes a density of 30 DPH. This results in a development yield of 13 dwellings, a figure which is substantially lower than that proposed by RBC within the RLP.

As is identified above, a significant proportion of the developable area included within the SHLAA comprises the car park, which is critical to the existing and future use of the club. The net developable area in both the SHLAA and the RLP should exclude the car park (as extended) to ensure that HCC can continue to run viably. This would reduce the net developable area of the scheme further.

The densities proposed by both the SHLAA (30DPH) and the RLP (41 DPH) are unachievable and are not consistent with densities of the surrounding area. The density of existing dwellings on Private Lane is approximately 23 DPH; the development along the northern boundary is a modern development built by McDermott Homes within the last 18 years and comprises an efficient layout which maximises space. It is evident that the development yield proposed within allocation H52 should be considered in this context and a more appropriate yet realistic density of 20 DPH anticipated should be proposed. This would provide a maximum development yield for H52 of 9 dwellings.

The removal of the car park from the developable area and the reduction in density would result in a proposal of approximately 4 dwellings; this level of development does not pass the threshold allocation size. The reduction in development yield raises significant concerns regarding the viability of the proposed development considering the access, surface water flooding and Sport's England constraints. RBC and HCC have not demonstrated that the site is suitable or available with a realistic prospect that the site can be viably delivered as is required by the NPPF. The site is therefore not deliverable and its allocation is not sound.

Conclusion

To conclude I respectfully request that allocation H52 be removed from the RLP. This representation has clearly identified that the proposed allocation of Land to the rear of Haslingden Cricket Club does not comprise a deliverable allocation for the following reasons:

- The proposed development area currently comprises a 'Playing Field' and it has been identified within RBC's Playing Pitch Strategy that the site should be retained and expanded. The development of the land would therefore be contrary to Paragraph 97 of the NPPF and would likely result in an objection from Sport's England as there are no specific circumstances which warrant its development.
- The proposed development area contains HCC's carpark. The carpark is essential to the ability of the site to operate as a Cricket facility. The removal of the car park would have a detrimental impact on residential amenity and create a significant traffic management and parking problem within the surrounding area on match days and when the club hosts events.
- The access to the site is not adequate and the road would need to be widened. The land is not within HCC's ownership and it has not been demonstrated that there is an alternative access solution available.
- The density and developable area indicated within Appendix 4 of the RLP are over-stated. The reduction in both of these to a realistic area would reduce the quantum of development able to be delivered and impact on the viability of the site.

The inclusion of this site within the RLP is therefore contrary RBC's evidence base and the NPPF and the allocation is not considered sound.

Yours sincerely,

Mrs J. George

Appendix

Photos taken from my property summer 2018 showing the use of the car park:

Photo taken from my property summer 2018 showing the location of the ageing practice pitch:

Photos taken from my property Summer 2018 showing the use of the playing field for practicing purposes:

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5195****Haslingden Cricket Club and B&E Boys Ltd**

Number of supporters:

Commenting on

H52

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan comply with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. The most recent consultation on the draft Local Plan was undertaken in summer 2017 and comprised the Regulation 18 stage. This Representation is submitted in response to the Council's current Publication Pre-Submission version of the Plan (Regulation 19). The consultation period runs from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the adopted Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses, as identified on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary.

Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation. For clarification, the Council's Errata to the Publication (Pre-Submission) version of the Local Plan (dated 03 September 2018), has been noted but it does not relate to the matters pertinent to this particular Representation.

BACKGROUND

1.4 Hourigan Connolly is instructed to review and comment on the emerging Local Plan in relation to land at Haslingden Cricket Club off Private Lane, Haslingden. This Representation is submitted on behalf of Haslingden Cricket Club and B&E Boys Limited who have a legal agreement in place to enable the delivery of the redevelopment proposals set out in this Statement.

1.5 Part of the site has been allocated for residential use under Policy HS2 and given the residential allocation reference H52. Whilst principle of a proposed housing allocation is supported, this Representation seeks a revision to the Local Plan to include a specific stand-alone policy which would encompass both a housing allocation and improvements to cricket facilities. In short, the housing allocation will deliver the necessary improvements, the two are intrinsically linked.

1.6 This unique Local Plan policy would provide for the delivery of a residential-led, mixed-use proposal which would not only result in the delivery of around 30 dwellings but would also directly result in the retention and enhancement of the existing facilities at the cricket club to the benefit of the local community.

1.7 For the purposes of transparency and positive planning, discussions regarding the detail of these Representations and the intentions of the two parties have taken place with various Officers of the Council prior to this Representation being submitted. Discussions have also taken place between the two parties¹, Sports England and the ECB to ensure that Sports England is fully apprised of the proposals. Discussions have also taken place with Haslingden High School with regards to the relocation of the practice pitch which is currently located on that area which is proposed for the housing allocation. The nature of these discussions is set out in further detail in Chapter 5.

1.8 The cricket ground is known as Bent Gate and measures an area of circa 2.75 ha. The ground can be found within the bend of the A56 Haslingden bypass dual carriageway which leads northwards to the town of Haslingden. Vehicular access to the ground is taken from Private Lane, off Broadway. Vehicles can be parked within the ground to the west of the existing pavilion, and in a small overspill area to the east of the ground which is accessed via a secondary vehicular access off Clod Lane.

Figure 1.1 Location of subject site, Haslingden Cricket Club (approximate area circled in red).

1.9 As part of the Council's previous 'Call for Sites' exercise, Haslingden Cricket Club made representations promoting part of the site for housing development. The submissions at that time promoted an area of land located between the rear of the pavilion and the rear of the properties on Grasmere Road. The site was included in the Council's Strategic Housing Land Availability Assessment (SHLAA) Update 2018, being recorded as Site Reference SHLAA16284. The SHLAA concluded that the promoted area of land was available, suitable and deliverable for around 30 houses. The SHLAA entry is contained at Appendix 1 to this Statement.

1.10 Following this exercise, the site has been included in the Local Plan as a proposed housing allocation referenced as Policy H52.

1.11 Since the submission of those representations by the cricket club, and since the publication of the Council's Regulation 18 Local Plan document, the club has held discussions with B&E Boys Ltd and a legal agreement has been negotiated. This legal agreement between the two parties secures the future of the cricket club by ensuring that the new housing allocation will directly result in the delivery of a series of benefits at the cricket ground. In summary, the housing is essential to assist in the financial security and continuation of the cricket club, and the housing cannot be delivered unless the benefits to the cricket ground are realised.

1.12 As part of the Joint Venture between the two interested parties, these Representations seek to modify the Local Plan to ensure that it includes a specific and unique policy which delivers benefits to the cricket club, as well as the delivery of new housing; the two distinct development elements are intrinsically linked and a stand-alone policy for a residential-led mixed use development would secure their successful and swift delivery.

1.13 This Representation sets out how the policy would deliver a new pavilion in a relocated position to serve the existing cricket club, the re-organisation of the cricket pitch to improve the standard of the playing area, the relocation of the practice pitch off-site to land at Haslingden High School (for use by the School and club) the provision of around 30 dwellings in the same area as that proposed under the current H52 allocation, and a new and improved vehicular access points.

SCOPE

1.14 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

OVERVIEW

1.15 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Councils such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The National Planning Policy Framework (hereafter referred to as the Framework) (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018, however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.² Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making. The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development. These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.
- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.
- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental

characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159), business (Paragraphs 160 – 161), infrastructure (Paragraph 162) and environment (Paragraphs 165 – 168).

HOUSING

2.21 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.22 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- “meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand”.

INFRASTRUCTURE

2.23 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.24 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.25 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.26 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.27 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report, in particular paragraph 030 (reference ID: 3-030-20140306 confirms):

“Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to

the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.28 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306):

“WHAT CONSTITUTES A ‘DELIVERABLE SITE’ IN THE CONTEXT OF HOUSING POLICY?

Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.”

2.29 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that:

“HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.30 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.31 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which have been submitted or will be submitted before 31 March 2018.

2.32 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.33 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

2.34 Crucially the provision of the right type of housing in the right locations is considered to be relevant to this Representation.

3. POLICY HS2: HOUSING SITE ALLOCATIONS

INTRODUCTION

3.1 Policy HS2: Housing Site Allocations identifies all sites within the Borough which have been allocated for residential development. For each site allocated, site area, capacity, delivery timescales and the type of residential allocation is identified.

3.2 Part of the site has been allocated for housing, being identified as Housing Allocation Reference H52 as detailed in Table 1 of the Policy HS2: Housing Site Allocations in the draft Local Plan3:

Figure 3.1 Extract from Table 1 of the Local Plan – Housing Allocation H52

3.3 The extent of the boundary of proposed allocation H52 is identified below:

Figure 3.2 Extract from Draft Policies Map – Housing Allocation H52

3.4 We support the aims of the Local Plan to identify key development sites which are central to the delivery of the overall strategy for new housing. We also support the principle of the proposed residential allocation for around 30 houses at the cricket club site. However, we seek a modification to the Local Plan so that it includes a stand-alone residential-led mixed-use policy which delivers not only housing (as currently proposed), but also allows for improvements to the cricket ground. The inclusion of this all-encompassing policy will facilitate a holistic approach to the overall development of the site.

3.5 In addition, Sport England has indicated they would object to the loss of the cricket strip, which sits within the area of HS2, unless provision is made for replacement facilities. The policy as it stands makes no reference to such facilities.

4. SOUNDNESS ASSESSMENT

INTRODUCTION

4.1 As mentioned in Chapter 2 above Paragraph 182 of the 2012 Framework deals with the examination of Local Plans. Local Planning Authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

4.2 In this section we consider the soundness of the Draft Local Plan Policies against the four key tests set out under Paragraph 182 of the 2012 Framework. It should be noted that for a Plan to be found sound it must comply with all of the four tests set out under Paragraph 182 of the Framework.

STRATEGIC POLICY HS2 AND POLICY H52: HOUSING SITE ALLOCATIONS

POSITIVELY PREPARED

4.3 Since the drafting of the previous version of the Local Plan (Regulation 18), the owners of the site have secured a legal agreement which intrinsically links the delivery of any housing at the cricket ground to the direct delivery of a number of improvements of the cricket facilities, for the benefit of the cricket club. As a consequence of this and as it stands currently, the Local Plan has not been prepared positively as the 30 houses in housing allocation H52 would not be delivered. This is because as part of a legal agreement between the owners and another party, the housing can only be delivered in conjunction with the delivery of the other elements of development that have been detailed in the previous Chapter 3.

4.4 Unless and until the Local Plan has been modified to incorporate the holistic approach to redevelopment at the cricket club, which would result in the delivery of houses in the first five years of the Plan, the Local Plan cannot be found sound.

JUSTIFIED

4.5 Policies HS2 and H52 fail to plan for the proper growth of the Borough as they do not acknowledge that there is no reasonable prospect of the allocated housing being brought forward unless the Local Plan makes explicit reference to the other development proposed in this Representation.

EFFECTIVE

4.6 As set out above, policies HS2 and H52 as currently drafted will not be effective because the housing will not be delivered unless and until the Local Plan has been modified to incorporate the holistic approach to redevelopment at the cricket club; the Local Plan is therefore not effective.

PROPOSED MODIFICATION

4.7 To be consistent with national policy, the Council is respectfully requested to revise the housing allocation H52 to make it clear that the delivery of housing at Haslingden

Cricket Club is to be delivered as part of a holistic approach. This approach would include a number of elements of additional new development which would result in the upgrade and improvement of the whole cricket ground.

4.8 To enable development across the whole site to be delivered through the Local Plan, including the residential proposals, and for the Local Plan to be found sound, we are suggesting that the Local Plan include a specific policy unique to the site at the cricket club. The draft wording of such a proposed policy is set out in the following Chapter 5.

5. PROPOSED REVISIONS TO THE LOCAL PLAN – MIXED USE POLICY

5.1 Haslingden Cricket Club and B&E Boys Ltd have entered into an agreement to promote the redevelopment of Haslingden cricket ground through the Local Plan process. This Joint Venture between the owners of the site, i.e. the cricket club, and B&E Boys Ltd secures an agreement for the successful delivery of the residential element of the proposals.

5.2 Bent Gate cricket ground is located within the urban boundary in Haslingden, being surrounded in all directions by existing built development. Residential properties adjoin the immediate boundaries of the site. The character of the wider area is urban, with a large residential area and associated facilities and amenities all located within close proximity.

5.3 The SHLAA entry (Appendix 1) identifies that the site is very sustainable with every-day amenities and facilities being within close proximity, as outlined below:

Amenity / Facility Distance to site

Access to public transport High frequency bus service (half hourly or more frequent). Bus stop is less than 100m on Broadway Road with access to several services including the 464 and X41.

Primary School Broadway Primary School located within 230m

Secondary School Haslingden High School Specialist Arts College located within 410m

GP Surgery 1.6 km to nearest GP

Supermarket Tesco superstore located within 600m

Recreation Cricket club immediately on site and children's play area located at the end of Thirlmere Avenue less than 200m away

Figure 5.1 Table of Amenities and Distances to the Site

5.4 Unlike many sites in the Rossendale Borough the site is flat in its topography, which is unsurprising given the nature of the current use.

5.5 There are no environmental or statutory designations or other technical considerations that would prejudice either the residential development of part of the site, or the development which would benefit the cricket club facilities. Issues of access and loss of cricket facilities is discussed in further detail below.

ACCESS ARRANGEMENTS

5.6 There are some inaccuracies in the SHLAA entry with regard access that need to be clarified to understand the current position regarding the availability and deliverability of the site.

5.7 The site is currently accessed directly from an unclassified highway, Private Lane; for the avoidance of doubt, the highway is not in private ownership, but is called Private Lane.

Figure 5.2 Map to show the road status surrounding the site

(Source: MARIO Maps, Lancashire County Council)

5.8 There is also a secondary access off Manchester Road (in the north east corner of the site) which provides access to an overspill car parking area and is used for access for emergency vehicles.

5.9 The promoters of the site have taken technical advice from a highways consultant and have been advised that the following arrangements would be suitable for the redevelopment proposals: the residential element would utilise the current access off Private Lane, subject to improvements, and the cricket club would be accessed from a new access point to be created off Clod Lane on the western boundary of the site.

5.10 The intention is, rather than traffic associated with the cricket club travelling down Private Lane past a number of residential properties (which is the current situation), cricket traffic would simply access the site directly from the A56 / Manchester Road roundabout onto Clod Lane and into the ground. Only the proposed new houses would be

served via Private Lane.

5.11 The new pavilion would be located close to existing secondary access (in the north east corner of the site), with car parking to be provided wholly within the boundaries of the ground, around the perimeter of the pitch. The precise layout of the proposals would be discussed and agreed with the Council prior to any planning application for development being submitted.

5.12 In conclusion, access is not a constraint to the proposed development.

IMPACT ON CRICKET FACILITIES

5.13 Haslingden Cricket Club uses the whole of the existing site for match play and practice sessions and the pavilion is used for local community functions as well as operations associated with the cricket club. The ground is also used by other sections of the community, including local primary and secondary schools, for the purposes of cricket development; a combined Rossendale Schools team uses the facility on a regular basis.

5.14 The club is a focal point of the community and the only cricket club in Haslingden and Helmshore. The club has attained ECG (English Cricket Board) Club Mark status which was renewed in September 2014, an award only given to cricket clubs for their outstanding contribution to the development of junior cricket. The club is therefore an important part of the local community delivering both social and health benefits and has ambitions to continue to improve and enhance the facilities to secure its future.

5.15 The development of part of the site for housing and the Joint Venture partnership with B&E Boys Ltd presents a fantastic opportunity to realise the club's future ambitions. These ambitions will not be to the detriment of the provision of quality cricket facilities and it has been important to the club that any development proposals secure future progress in cricket development. As such, Haslingden Cricket Club has been in early discussions with Sport England to seek to ensure that the proposals for redevelopment meet the necessary criteria for the continued provision of cricket facilities at the site.

5.16 Sport England and the ECB have been made aware of the proposals and are supportive in principle as set out in this Representation and continues to offer its support to the club. Whilst the allocation and development of part of the site for housing would result in the loss of an area currently used for cricket practice sessions, an alternative site for the practice sessions has been identified and agreed in principle. This area is located off-site within the grounds of Haslingden High School which is located circa 400 m west of the cricket ground on Broadway. The high school is in agreement with this proposal and any policy in the Local Plan would be worded in such a way to secure this arrangement.

5.17 This would achieve a fully compliant junior cricket pitch very close to this cricket club site. The school has space within its existing playing fields for an all-weather strip a strip, as seen on Google earth. A synthetic strip would be a straight forward investment with a low maintenance cost for the school. It would allow a school, which we understand previously has played competitive cricket, to again play and teach the sport on a synthetic surface. It would also create a strong school- sports club link and clear access route for junior players into the community club.

5.18 Therefore, on the face of it, the redevelopment proposals would result in the loss of an area of the ground which is currently used by both the club and other sections of the local community for practice sessions. However, an alternative area of land will be provided off-site less than 450m away from the cricket ground, which will provide for a much-improved standard of practice play and this has been agreed in principle with Sport England and Haslingden High School. There would therefore be no loss in any cricket facilities and there would be no constraint to development in that regard.

5.19 Similarly, the proposals for the site would not result in any loss of quality of the main field. There may be a requirement to reorganise the boundaries of the main field to allow for vehicle access to car parking areas, however the size and orientation of the current field is such that this could be accommodated without detriment to the quality and standard of the playing facilities.

PROPOSED POLICY – MIXED-USE DEVELOPMENT

5.20 Taking all of the above into account, the following wording is suggested for the inclusion of a unique policy in the Local Plan:

Haslingden Cricket Club, land off Private Lane

Haslingden Cricket Club is allocated for residential-led mixed-use development including around 30 houses. Development proposals for the site must:

1. Retain adequate land and facilities for the continued operation of Haslingden Cricket Club including the provision of a pitch, practice net area, and an element of car parking to serve the cricket club.

2. Include for the provision of a new, relocated pavilion to serve the cricket club and other local community functions.
3. Provide for the relocation of the practice pitch off-site to land at Haslingden High School.
4. Provide satisfactory measures to protect both the proposed dwellings and surrounding existing dwellings from the risk of ball strike from the adjacent cricket pitch, where adequate safety margins are not in place.
5. Deliver around 30 houses in the western part of the site to the rear of the existing properties on Grasmere Road.
6. Provide satisfactory vehicular access to the new residential properties off Private Lane.
7. Provide a satisfactory new vehicular access from Clod Lane to serve the cricket ground.
8. Provide a safe and convenient pedestrian footpath access to the site, linking it to the footpath network.

5.21 The extent of the land to which the Policy would relate is shown overleaf at Figure 5.3

Figure 5.3 The cricket club with the extent of the site boundaries edged in red

5.22 This holistic residential-led mixed-use policy would be in accordance with Paragraph 47 of the Framework which requires Councils to “significantly boost the supply of housing”.

5.23 To conclude, the site is very sustainably located. The land included within the housing allocation is available and deliverable and we therefore support the identified delivery timescale of 1-5 years and we support the proposed allocation for up to 30 units. However, the housing will only be delivered if the cricket facilities are upgraded and therefore a modification is necessary to the Local Plan to facilitate the residential-led mixed use development at Haslingden Cricket Club.

6. CONCLUSIONS

6.1 The starting point for consideration of the Council’s draft Local Plan document is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 We support the principle of the proposed housing allocation (H52) under Strategic Policy HS2. However, this support is subject to a modification to the Local Plan to enable the inclusion of a stand-alone and unique policy which would deliver a holistic approach to the redevelopment of Haslingden Cricket Club.

6.3 A draft policy which deals with the redevelopment proposals specific to the subject site has been proposed in the preceding Chapter. As part of a Joint Venture between Haslingden Cricket Club and B&E Boys Ltd, the draft policy would not only deliver around 30 houses within the first five years of the Plan, but it would also deliver improvements to the provision of cricket facilities in the Borough.

6.4 The site is available and deliverable now, subject to the above provisions.

Appendix 1 SHLAA Entry Reference SHLAA16284

SUGGESTED MODIFICATION

3.6 As stated in Chapter 1 of this Representation, we wholly support the proposed housing allocation at the land to the west of the existing cricket pitch and within the ownership of Haslingden Cricket Club. However, to deliver a holistic and comprehensive approach to the upgrading of the existing cricket club facilities, we request that the Local Plan be revised to include a specific and unique policy which enables a mixed-use development at the cricket club to include the following:

- New, purpose-built cricket pavilion and local community function room to be positioned in a new location in the east of the site adjacent to the new access off Clod Lane.
- Re-organisation of the cricket pitch to improve the standard of the playing area.
- Provision of practice nets.
- The relocation of the practice pitch off-site to land at Haslingden High School.
- Provision of dedicated car parking spaces.
- Delivery of up to 30 dwellings in the same area as that proposed under the HS52 Allocation to the west of the site.
- New vehicular access from Clod Lane to serve the cricket club.

3.7 The policy would be residential-led which would be in accordance with Paragraph 47 of the Framework which requires Councils “significantly boost the supply of housing”.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H55

Reference **5151 Mr Brian Scholes** Number of supporters:
 Commenting on HS2 H55
 Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

I would like to give support to H55 Carr Mill & Boltons Miil proposal for Housing at Carrlane Cowpe rd Waterfoot BB4-7BY

Do you wish to participate to the Examination In Public? **No** Reasons

H6

Reference **35 Mr David Stansfield** - Number of supporters:
 Commenting on - H6
 Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The area shown for development on the above reference SHLAA16209 is North of Goodshaw Lane and on a bend on Burnley Road the A682. Access to the development would have to be by individual drives or via an access roadway, any of these will be on the bend in the main road with no view of traffic coming from Burnley and the view of traffic from Rawtenstall would not be much better. There have been two serious road traffic accidents on this short section of road where the housing is proposed in the last 15 months. In the first incident which happened on the 28th June 2017 two cars were written off and two more cars were damaged. On the second incident two more cars were written off and another car damaged, the road was closed for a while and all three emergency services were in attendance. This is in addition to all other comments regarding the infrastructure, congested highways, lack of school places, local doctors and dentists being near to capacity and the capacity of the sewerage systems.

Due to the small area shown on the proposed plan there can only be four or five new properties that could be built on this area, so therefore I think that this section should not be developed as the considerable risk to the increase in road traffic accidents out ways such a small development.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	5116 Mrs Sarah Sengul	Number of supporters:
Commenting on	HS2	H6
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer
		Does the Local Plan complies with the duty to co-operate? Did not answer

By email:

Good evening. I live with my two young children at 1354 Burnley Road Loveclough. I am a widowed lone parent and I work full time. My children attend Crawshawbooth Primary School however in 2012 I had to fight for a place for my daughter because the school was oversubscribed. This was still the situation in 2015 when my son started school. The local GP surgery St. James' Medical Centre where we are patients is full and it is routinely difficult to get an appointment. Likewise the dental surgery. My husband and I had to wait 3 years before we were registered with an NHS dentist miles away in Baxenden. Burnley Road is dangerous. So-called traffic calming measures are ineffective. The volume of traffic is incredible as it is which places increasing pressure on the road surfaces, pollutes the environment and presents real danger to the safety of the public in particular local residents. I speak from experience. On 28.6.17 a motorist hit the bollards outside my house and wrote off my neighbours' cars. Luckily the children and I were out. On 15.5.18 we were in however when the same thing happened. This time my car was written off as was the driver's and my neighbours' cars damaged again. I saw it happen and it was a miracle nobody was killed. I have contacted LCC about this and my concerns about the suitability of those bollards. We take our lives in our hands every time we get into and out of our cars which are parked outside our homes in designated spaces. For these reasons I believe it would be most unwise to build more houses on the land opposite us. That stretch of road is dangerous enough and incorporates a blind bend in both directions. More houses there would increase that danger quite apart from the devastating impact development would have on the wildlife. We see deer, foxes and badgers in the fields in front and behind our home and some regard should be had to the importance of preserving their natural habitat. Please abandon the proposal to build on this land.

By letter:

I appreciate that at this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained somewhat by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions - for that is what they are - to the proposed Local Plan. Locals are far better placed than any to comment on the appropriateness (or otherwise of particular sites), having knowledge of the topography and attendant issues which elude even the most conscientious planners. What is proposed for H13, for example, appears to have no regard at all for demonstrable flood risk. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst no legal expert, I think it legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed to consult on these proposals, I feel entirely justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As a resident, I know the area well and wish to register my objections on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previous adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are ill-advised.

Thirdly, the road network simply cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at the Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional +-700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that "solving Rossendale's traffic problems is impossible".

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated +-300 pupils. Should the school be enlarged, it would become of an educationally unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H60

Reference **95 Dr Janet Barrie** - Number of supporters:

Commenting on - HS2 H60

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

This representation is specifically with regard to land adjacent to Johnny Barn Farm in Higher Cloughfold and land behind nos 406-420 Newchurch Road Higher Cloughfold. I consider the local plan to be unsound because: The interactive map suggests that the land behind 406-420 Newchurch Road is now included in the urban boundary and so available for building yet this is not discussed in the text. Both areas already suffer from severe traffic problems and flooding issues. The addition of 80 houses to land north of Newchurch Road at Johnny Barn and any development of the land behind 406-420 Newchurch Road will exacerbate these. The development is therefore not sustainable.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5037**

VH Land Partnerships Ltd and Executors of Mr Schofield

Number of supporters:

Commenting on

HS2

H60

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I refer to the above consultation. I am writing on behalf of VH Land Partnership Ltd, acting on behalf of themselves and the landowner. My comments relate to proposed site allocation H60.

The executors of John Schofield (deceased) own land part of which is proposed to be allocated for housing in the plan (site H60). My clients fully support this proposed allocation but puts forward the strong suggestion that this proposed allocation ought to be extended, to include additional land, also in his ownership. The site, including the additional land is shown on the attached plan. You should note that we have suggested the inclusion of this additional land in previous consultations on this Local Plan but our suggestion has not been positively responded to by the Council.

The additional land, like the proposed allocation land, is designated as countryside in the current Local Plan (Core Strategy). It is however adjacent to the settlement boundary and in an equally sustainable location. Factors supporting its inclusion in the proposed allocation are as follows:

1. It presents no significant constraints against its development (access, drainage, flood risk etc), in this respect being similar to the proposed allocation land.
2. It would equally support current Core Strategy, emerging Local Plan and national planning objectives, not least in that it would assist in broadening the choice of land for development.
3. It would not have an adverse landscape impact. The inclusion of the additional land would enhance the potential for landscape improvement, retention of views and enhancement of green infrastructure.
4. It would relate well to existing and proposed development and would not adversely impact on the Higher Clough Fold conservation area.
5. It can be accessed and its inclusion would broaden the choice of access to the overall site.

In reference to bullet point 2 above, it should be noted that both the proposed allocation and the extended housing allocation, as proposed by my clients, would meet the criteria set out in current Core Strategy Policy 1, relating to extensions to the urban boundary, principally in that:

- The extension/amendment to the urban boundary would not adversely affect aspects of the natural environment such as biological, geological, geomorphological, green infrastructure and landscape character assets, including habitats and species of importance for nature conservation or should be capable of full mitigation;
- the amendment/extension would not result in the amalgamation of settlements ; and
- the amendment/extension would not result in a significant impact on local views and viewpoints.

My clients would therefore suggest that the urban boundary set out on the proposals map should be revised to include the (extended) site.

In addition, emerging Local Plan Policy HS1 states that the net housing requirement for the period 2019-2034, will be achieved through providing at least 3 180 net additional dwellings over the plan period equating to 212 dwellings per year. It does not preclude a level of development above that required, as a minimum, to meet the identified requirement. The extension to the allocation, as proposed by my client, would allow for a greater choice of housing land, reducing pressure for development on less appropriate and less sustainable sites elsewhere.

My clients therefore suggest that the allocation be extended to include this additional land, which is clearly developable, in a suitable location for housing development, which would be viable with a reasonable prospect of being available in the short or medium term.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5197 Mr Marcus Hudson Lancashire County Council** Number of supporters:

Commenting on H60

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS2.53 – Johnny Barn – A new access via Newchurch Road appears achievable with the loss of 2 possibly 3 mature highway trees in the verge and mature trees within the site. A pedestrian/cycle link should be provided through the site to Johnny Barn Close and the surrounding links.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H65; H66; H67; H68; H69

Reference **5118 Teresa Barber** Number of supporters:

Commenting on HS2 H65; H66; H67; H68; H69

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Objection to new builds

Dear Sir/Madam ,

Please accept my objection to new builds proposals in Whitworth There is simply not enough capacity to cope . The schools are at their limit , the Doctors are at their limit ,all services fully stretched We don't have adequate roads to service the amount of traffic now so it would be a nightmare if this proposal goes ahead Please consider residents Regards MT Barber 19. Burnedge Close OL128BU

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H65; H68

Reference **111 Mr Jo Furtado** - Number of supporters:

Commenting on - HS2 H65; H68

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

This is a matter I wrote about in response to the previous plan. Once again there is recognition whatsoever in the plan that Whitworth has traffic issues every bit as pressing as those on the A681 between Bacup and Rawtenstall, and those at the Rawtenstall gyratory. The A671 at and beyond the southern end of Whitworth is incredibly busy at rush hour, particularly in the mornings, with queues stretching back all the way from Rochdale town centre to near the Whitworth boundary most mornings. The alternative route from Healey Corner into/beyond Rochdale is just as difficult too. I am aware, obviously, that such jams - worse still if there's an incident, of course - are situated, in the main, beyond the boundary of Rossendale, but the vast majority of those snarled up in these jams are people from Whitworth and Bacup. Bad as it is now, the housing development at Albert Mill will only make things more stressful, and if houses are built at Spring Mill (a bigger development) that will make it worse again. Your plan is unsound because it pays no heed whatsoever to these connected matters, which clearly are a matter of concern for the quality of life in the south-eastern parts of the Rossendale area. It is difficult to see any sort of short-term amelioration of, let alone solution to, the traffic problem per se, but I would have thought a responsible authority would have made the necessary connections, and commented on them in their plan - and would at the very least have monitored the increase in traffic from the almost-complete development at the old Orama Mill site; and set in train plans to monitor the effect on traffic flow of the Albert Mill development before accepting any plans to begin building extra houses at Spring Mill; and consulted more specifically on traffic access to the Spring Mill site BEFORE giving any sort of go-ahead to builders at Spring Mill.

-
Do you wish to participate to the Examination In Public? **No**

Reasons -

H66

Reference **5197 Mr Marcus Hudson** **Lancashire County Council** Number of supporters:

Commenting on H66

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS 2:102 - Barlow Bottoms, Whitworth – The existing access onto Market Street appears suitable and could be designed to accommodate the potential mixed use for residents and quarry traffic.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H68

Reference **13 Mrs Lois Lees** Number of supporters:

Commenting on - HS2 H68

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

The plans for the spring mill site are not legally compliant with the local plan. In the 5 year housing land supply report 2017, there are 45 houses planned for Spring Mill, Gleeson are trying to build 119. Biodiversity, Geodiversity and Landscape Conservation This policy clearly states that development will not be permitted unless it cannot be demonstrated that there will be no adverse impacts on species or habitats protected by law. This includes the internationally important sites. The purpose of this policy is to protect the natural environment within the Borough. As such there will be no likely significant effects on the qualifying features of the five international sites as a result of this policy. There is a badger sett on the site, bats, and a multitude of other creatures. The land is a stepping stone to the moor, the development will block access through for animals and wildlife. The plans also divert public footpaths and bridleways which is not acceptable. The land is also contaminated. Disturbing the land will have an adverse affect on both humans and wildlife. The proposed build does not comply with Phase 1 Habitat Report and the Arboricultural Impact Assessment, the report was carried out at the wrong time of year, and did not even identify the badgers or the pond/spring that are on the site. There are also a number of mature trees that do support bats and other birds, contrary to their report.

The proposal to use the site at Spring Mill Whitworth has not taken into account the access, land contamination, wildlife disruption, increase in traffic, and the fact that there are no school places available in the area. Whitworth has already built or has plans to build 150 houses without this development. The roads and infrastructure cannot sustain any more houses.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **13 Mrs Lois Lees** Number of supporters:

Commenting on HS2 H68

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

The plans to build on Spring Mill Whitworth HS2.107 site 68 . Trees are to be removed and there are not enough trees in the plans to replace them. Gleeson state in their report - The proposed development does not include any affordable housing which is contrary to the Local Plan. Lancashire County Council have commented on the proposed plans, and they are saying that there are no school places available for the site.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5171**

Gleeson Homes and Regeneration

Number of supporters:

Commenting on

HS2

H68

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Rossendale Draft Local Plan Pre-Submission Publication Version
Representations in respect of the Land at Spring Mill, Westgate, Whitworth
Dear Sir / Madam,

I write in response to Rossendale Borough Council's Draft Local Plan Pre-Submission Publication consultation specifically in relation to the Site at the land at Spring Mill, Westgate, Whitworth on behalf of Gleeson Homes and Regeneration. The Site is currently the subject of a full planning application, reference 2018/0318, which is seeking planning permission for 119 no. dwellings at the Site, the proposed masterplan for which is included at Enclosure 1 of this letter.

Site Allocation

As shown on Rossendale Local Plan Policies Map (Pre-Submission Publication Version) the entire Site is allocated for a future residential use, allocation reference H68 'Former Spring Mill (land off Eastgate and Westgate)'.

The corresponding policy wording is set out in Policy HS2 'Housing Site Allocations' within the Local Plan Pre-Submission Publication Document itself. Table 1 of the Local Plan forms part of Policy HS2 and outlines the following expectations for the Site:

- The developable area is assumed to be 3.7 hectares;
- It has a capacity for approximately 111 no. dwellings, applying a density of 30 dwellings per hectare;
- Delivery is anticipated in Years 1 through to 10 of the Local Plan period; and
- The Site is correctly identified as a brownfield site.

As the capacity of the Site is over 50 dwellings Policy HS2 requires a masterplan to be prepared to ensure a comprehensive approach to development.

From the outset it should be noted that we strongly support the allocation of this Site for a future residential use.

Basis for the Allocation

The allocation of the Site is the result of the identification, and robust assessment, of the Site as set out in the Strategic Housing Land Availability Assessment (SHLAA), dated August 2018. The 2018 SHLAA comprises of a 'Stage 1' assessment which filtered candidate sites so as to focus on those that met the locational requirements of the emerging planning policies and general sustainability considerations. Sites which passed the 'Stage 1' assessment were then considered in respect of their availability, suitability and achievability (Stage 2) in order to ascertain if the site should be allocated for a future residential use.

The Former Spring Mill Site (reference SHLAA16005) was robustly assessed by the Council and acknowledged to be a brownfield site, within the urban boundary of Whitworth that benefits from an extant planning permission for 45 no. dwellings (planning permission reference 2012/0171). Furthermore, the Site is identified as being well connected to existing services and infrastructure, including public transport, and is relatively free from constraints.

The main constraint identified with the development of the Site was the need for remediation, given former employment uses at the Site. In the 2017 SHLAA it is noted that the cost of remediating the Site was likely to delay delivery until 6-10 year period of the Local Plan, however in the up-dated 2018 SHLAA this has been brought forward to the 1-10

year period of the Local Plan. This is because the Site is currently the subject of a planning application submitted on behalf of Gleeson Homes, who specialise in bringing forward complex and marginal sites, and are committed to developing this Site upon receipt of an implementable planning permission. This reassessment of the site as set out in the 2018 SHLAA and housing trajectory is fully in compliance with the National Planning Policy Framework (NPPF) (2018) paragraph 31, which requires policies to be underpinned by relevant and up to date evidence.

The current planning application is supported by a suite of documents which provide a more detailed investigation of the Site¹. This includes an intrusive site investigation, alongside ecology, arboriculture, highways, flooding and drainage assessment which Gleeson Homes have fully taken into account when masterplanning the proposed scheme. They are satisfied that this Site can come forward in compliance with the Housing Trajectory set out in Appendix 4 of the Local Plan Pre-Submission Publication Document.

It is therefore clear that housing allocation H68 'Former Spring Mill (land off Eastgate and Westgate)' is based on a robust assessment by the Council, which is now evidenced further by the recent planning application submission seeking permission for a residential redevelopment of the Site. The Site is therefore considered to be deliverable and developable now, in accordance with the definitions as set out in the NPPF, and should form part of the housing land supply for the borough going in to the next Local Plan period.

Compliance with Key Emerging Policy Objectives

It should also be taken into account that the allocation of the Site for a future residential use also complies fully with key policy objectives set out in the Local Plan Pre-Submission Publication Draft, and housing needs for the Borough as identified in the 'Housing Topic Paper' (August 2018).

In the first instance the Site is previously developed land that is not allocated or designated, and wholly located within the existing settlement boundary of Whitworth. Whitworth is identified as one of four 'key settlements' in emerging Policy SS, where growth and investment are to be focussed over the plan period. Furthermore, emerging Policy SD2 requires all new development to be located within the defined urban boundaries, which the Site is. Emerging Policy HS1, which identifies the Borough's housing requirement and how it will be achieved sets a requirement for 30% of the Borough's housing land to be previously developed land. The allocation of the Site is therefore in compliance with the key policy objectives of the emerging Local Plan, and will ensure an efficient use of previously developed under-utilised land, which is also a priority for National Government, as set out in Section 11 of the NPPF.

The allocation, and subsequent delivery, of the Former Spring Mill Site will enable the safeguarding of unallocated greenfield and Green Belt sites throughout the Plan period. The allocation of the Site is therefore wholly appropriate and clearly achieves key sustainable planning policy objectives.

It is noted that at paragraph 2.3.5 of the Housing Topic Paper that there is an increasing need in good quality family housing in Rossendale Borough. The current planning application is seeking permission for a mix of family houses, each with their own outdoor amenity space. This comprises of 32 no. two bedroom dwellings; 79 no. three bedroom dwellings; and 8 no. four bedroom dwellings. The scheme is therefore designed to ensure to meet the increasing need for family homes in Rossendale.

Furthermore, Gleeson Homes focuses solely on building low cost homes for people on low incomes. The company builds a range of affordable homes for sale to people who would otherwise be unable to afford a new home, thereby helping them onto the property ladder. Gleeson Homes fund all of its own projects, allowing regeneration to take place without reliance on Government investment.

The company's success is borne out of a thorough understanding of its customer needs and balancing aspiration with affordability. Gleeson's management team has specialist knowledge of all aspects of regeneration and a combined experience of over 150 years of building and selling low cost homes.

Gleeson are pleased to say that a full-time working couple on the national minimum wage, can afford to purchase a Gleeson 2 bedroom home on a 3.5 times Loan to Value ratio, on all 70 of their live sites in secondary locations across the north of England. The 2 bedroom homes are always a minimum of 25% of the mix of units on all their sites, and if bought with Help To Buy only require a 5% deposit (which is usually less than £5,000). Mortgage repayments on these 2 bedroom homes sold with Help To Buy and 5% deposit, would range from £50-£65 per week, based on a 35 year Halifax Help To Buy Mortgage). On this basis the proposed 2 bedroom dwellings also provide an opportunity to first time buyers, therefore reducing reliance on the private rented sector as a way for young people to live independently, as set out in the Housing Topic Paper.

It is very clear from the evidence base that this Site aligns with the key objectives of National Planning Policy and the emerging Local Plan objectives namely the priority to redevelop brownfield sites within the urban boundaries ahead of greenfield sites and the need to release Green Belt land. The allocation of the Site therefore ensures accordance with not only Policy HS1 (Meeting Rossendale's Housing Requirement) but also emerging policies SS (Spatial Strategy), and SD2 (Urban Boundary and Green Belt). In addition, the proposals that are currently subject of planning application 2018/0318 have been designed to meet the housing requirements for young families as identified in the Housing Topic Paper and will be delivered by a National House Builder with a proven track record of delivery of new family homes.

The allocation of the Former Spring Mill Site in Whitworth is fully supported by Gleeson Homes and Regeneration, and should remain as an allocation as the Local Plan progresses.

I trust that these comments will be taken into account as the Council progresses with the Local Plan. I would like to be kept informed of the progress of the Local Plan, and reserve the opportunity to take part in the Inquiry should it be deemed necessary. Should you require any clarification on any points made in this letter please do not hesitate to contact me as per the details provided below.

Yours sincerely

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H69

Reference **5167**
s

Whitworth Town Council

Number of supporters:

Commenting on

HS2

H69

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

To who this may concern,

Thank-you for the opportunity for the Town Council to consult on the Rossendale Local Plan. It was resolved that Whitworth Town Council oppose to site H69 Cowm Water Treatment Works being included in the local plan as suitable for housing as this land is in the greenbelt and should be protected. Council have no other objections to this version of the Local Plan. This was moved by Councillor Neal and seconded by Councillor Barker.

Kindest regards

Melanie

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5186 Mrs	Christine	McDermott	Number of supporters:		
Commenting on		HS2		H69		
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Yes
ACCESS, EGRESS - MAJOR ADVERSE IMPACT						
There is only one ancient road-way onto the site, suitable for a single vehicle with no passing places. Also access over two old bridges built when reservoir was constructed						
Taking this into account how are residents to get off and onto the site						
ROAD MAJOR ADVERSE IMPACT						
The road through TONG END is already overloaded with traffic. Thousands of people come to Cowm from early morning to late evening. Plus the quarry traffic.						
HERITAGE MAJOR ADVERSE IMPACT						
Tong End is one of the oldest parts of Whitworth with listed dwellings having heritage status. Would new development be sympathetic? This area should be protected.						
DOCTORS						
Over subscribed						
SCHOOLS						
Over subscribed						
FLORA, FAUNA MAJOR ADVERSE IMPACT						
The site is home to protected species of flowers eg. English Bluebells. There are newts, frogs, toads all endangered. Also deer use it in the fence month of May to call.						
ECOLOGICAL STUDY						
Bowland Ecology Unit did an ecological survey years ago. In the middle of December.						
EMPLOYMENT						
There are no jobs						
UNDER GROUND RESERVOIR - MAJOR ADVERSE IMPACT						
Adjacent to the site is a large underground storage reservoir no mention of this has been made.						
YIELD						
Not viable economically to erect just 20 houses, UU: much infrastructure which would affect development.						
Do you wish to participate to the Examination In Public?						
		Did not answer	Reasons			

Reference **5197 Mr**

Marcus

Hudson

Lancashire County Council

Number of supporters:

Commenting on

H69

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS2:108 – Tong Lane itself is constrained in width by buildings and has poor pedestrian provision. There is a higher than average percentage of HGV traffic on Tong lane due to the Quarry to the north. The site access off Tong End is too narrow currently and requires widening and what is potentially third party land. The provision of 20 houses appears high considering the site is crossed by the reservoir spillways however the provision of any additional housing would be a concern due to the constraints of Tong Lane and the site access.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

H7

Reference **5056 Ms**

Marie

Hargreaves

Number of supporters:

Commenting on

HS2

H7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir/Madam,

H7 designated for 10 houses has been mowed by the council for 40 years and promoted as a children's play area. It seems wrong that a government promoting a healthier lifestyle should wish for the destruction of an area that was created to replace the existing play ground which was part of the land on which Hawthorne Meadows was built.

K. Iveson

M. Hargreaves

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5110 Mr Daniel Firth-Powell	Number of supporters:
Commenting on	HS2	H7
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer Does the Local Plan complies with the duty to co-operate? Did not answer
<p>Dear X,</p> <p>I hope you don't mind me getting in touch? I am writing to you regarding the local plan to build houses in the Crawshawbooth/Loveclough area. I attended the recent meeting at the Top Club to listen to the information and how the plans will affect the valley. It sounds very much a 'Hobson's choice' and it is clear that if solutions aren't found locally then the government will take over and be less sympathetic to the character of Rossendale.</p> <p>I live in Laburnum Cottages, just off Church St. Looking at the plans an area has been earmarked just behind the cottages for up to 23 dwellings (this sounds like an awful lot for such a small space!). I accept that houses are needed and this land is a relatively easy development site but I would like to raise a concern regarding parking in the Church St area. The street is very congested on both sides all the way up, resulting in many people having to park up Driving Gate, which will essentially be the road into the new houses. Is it possible for the planning team to take this into account and consider building in provision for extra parking in this area? I suspect that the new homes will be built with private drives, like other newer houses in the area e.g. Hawthorne Meadows, but potentially there will be a loss of space for current homeowners to park.</p> <p>I appreciate that this is probably a premature request (and not a priority!) given the stage the planning is at but as a local resident parking is already a problem and I am concerned that this could be overlooked if not flagged up.</p> <p>If you would like to discuss this further please don't hesitate to get in touch.</p>		
Do you wish to participate to the Examination In Public?	Did not answer	Reasons
H70		

Reference **5152**

Nevas Ltd

Number of supporters:

Commenting on

HS2

H70

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Rossendale Draft Local Plan: Regulation 19 Consultation

Policy HS2: Housing Site Allocations

H70 Irwell Vale Mill Site

I write on behalf of Nevas Ltd which owns the above site as identified on the Policies Map within the Rossendale Draft Local Plan. Nevas Ltd fully support the proposed allocation of the site for residential development as shown at Table 1: Housing Site Allocations within the Local Plan Written Statement.

The site is 'deliverable'. It is available now for development; it offers a suitable location for housing development now and housing could be delivered on the site within five years. As you are aware a planning application (ref. 2017/0290) for residential development has been submitted for land, within the proposed allocation, to the south of the river Ogden. This demonstrates the availability and deliverability of the site.

The factory has been vacant since December 2015. It has been actively marketed since that date. No firm interest or offers have been made for the site as a going concern. As such we do not consider that it is appropriate to continue to retain the land in employment use.

Nevas Ltd support the proposed alteration to the Green Belt covering the northern portion of the site. The Green Belt Topic Paper (August 2018) states that The Green Belt Review Report (November 2016) recommended that this parcel (Parcel 33) could be released subject to suitable design and strengthening planting. Good landscaping would create the opportunity to create an enhanced entry into the Conservation Area.

Nevas Ltd are aware of the comments made in the Rossendale Hybrid Level 1 and Level 2 Strategic Flood Risk Assessment (November 2016) regarding the flood risk within the area and that there are opportunities within the site for storage and mitigation associated with new development. The SFRA recommends the application of the Exception Test. In relation to this Nevas Ltd considers that the development of the site would bring with it opportunities to provide flood alleviation measures for the site and the wider area. This would provide wider sustainability benefits to the local community and reduce the overall flood risk on the site and the wider area. As such the development of the site would meet the Exception Test as outlined at paragraph 160 of the NPPF. This point is referred to in the Green Belt Topic Paper (August 2018) which states that the Environment Agency 'support the development of the site as demolition of the Mill would create the opportunity to reconfigure the River Ogden at this point and reduce overall Flood Risk in Irwell Vale'.

There were three objections (ID refs. 950, 1367 and 1439) to this proposed allocation as outlined in 'Comments received on the Rossendale Draft Local Plan 24 July 2017–09 October 2017' Report. These related in the main to infrastructure provision, traffic impact, the release of Green Belt and flooding. The latter two issues are addressed in the comments above. In terms of traffic, access to the proposed allocation can be made north of the River Ogden and therefore would not significantly increase traffic movements within the existing settlement of Irwell Vale. In addition it is also important to recognise that the former employment use generated traffic movements including a heavy goods vehicle which needs to be taken into account when assessing any traffic impact from proposed residential development on the site. The issue of infrastructure provision will be addressed within the Infrastructure Delivery Plan which is developed through consultation with key providers including Lancashire County Council. The site has key services, utilities and infrastructure related to its previous employment use. These would help service new development on the site. The exact requirements would be assessed when detailed proposals are drawn up for submission with a planning application.

In conclusion Nevas Ltd support the proposed allocation of the site for residential development to help Rossendale

Council meet the objectively assessed housing need and can confirm that the site is deliverable as defined in the NPPF.

Should you require any further information or have any queries in relation to this representation please do not hesitate to contact me.

Yours sincerely

For Cass Associates

13 December 2018

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H70; H71; H72; H73

Reference **5117** **Susan** **Seddon** Number of supporters:

Commenting on HS2 H70; H71; H72; H73

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir,

I am writing to object to the Local Plan. My main concern is the infrastructure of Rossendale. NHS East Lancs has raised concern about the number of additional patients. Most of the schools are full. Local roads are poor. We have no train links to anywhere. We have a big issue with flooding, and we have the worst traffic in the country. Free Press 14/09/18

400 new houses in Edenfield (800 cars at least) would create a big traffic jam. There are no doctors and both primary schools are full.

45 new houses in Irwell Vale would increase the Conservation Area by 100%. No public transport, no doctors. Flooding a BIG risk. Irwell Vale Road could not cope with another 90 cars.

I wish to be kept up to date on the Local Plan progress.

Yours sincerely,

Susan E Seddon

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

H71; H72

Reference **34 cllr** **Janice** **Johnson** - Number of supporters:

Commenting on 5 TRANSPORT H71; H72

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

MY WORRY IS FOR THE PLOT OF LAND H71/H72 MARKET STREET EDENFIELDTHIS IS A LOT OF HOUSES IN AN AREA THAT: HAS ONE OVERSUBSCRIBED SCHOOL .NO HEALTH CARELIMITED PUBLIC TRANSPORT,THE HERITAGE RAILWAY HAVE NO PLANS OF PROVIDING PUBLIC TRANSPORTSMALL ALREADY VERY BUSY ROADS IT WILL BE 20 YEARS BEFORE HIGHWAYS ENGLAND LOOK AT A56/M66THERE IS LAND ON BOTH SIDES OF THIS DEVELOPMENT PLANNED FOR BUILDING /EDENWOODWOOD BRIDGE AND IRWELL VALE THESE SIGHTS ALONE WILL INCREASE TRAFFIC BY AT LEAST 300 CARS .

REMOVE H71/H72 FROM PLAN

Do you wish to participate to the Examination In Public? **No** Reasons -

H71; H72; H73

Reference **64 Mrs Dorothy Stewart** - Number of supporters:
 Commenting on - Soundness of plan H71; H72; H73
 Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

The draft Local Plan in respect of the proposal to release Green Belt land in Edenfield for development is unsound for a multitude of reasons including the following: –1. We consider there are sufficient developable brownfield and other sites within the Borough to satisfy housing need without the need to release Green Belt land for development.

2. There are over 1,000 empty homes in Borough that have not been taken into account when assessing housing supply. 3. The Council have failed to demonstrate that ‘exceptional circumstances’ exist to propose the removal of Green Belt in the Borough and therefore the proposal is contrary to national planning policy. 4. The A56 as a possible Green Belt boundary does not justify the release of the land to the east of it from Green Belt. 5. The contention that the release of the Green Belt will have only minimal impact on openness is unfounded. 6. The transport access arrangements for strategic development in Edenfield are inadequate and have not been tested or considered by the Council before proposing the allocation. 7. The impact of strategic development in Edenfield on the junctions and roundabouts in the area have not been fully tested by the Council before proposing the allocation. 8. Following the flooding in the Rossendale Area on Boxing Day 2015 when ground and surface water couldn’t drain away because of the high levels of the Rivers Ogden and Irwell resulting in a number of houses in Irwell Vale and surrounding local communities being flooded the plan does not include viable plans to ensure this doesn’t happen again following the very significant development of up to 456 house in Edenfield.

-
 Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5020 Mr Arnold Walder-Wood** Number of supporters:
 Commenting on HS2 H71; H72; H73
 Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I wish to object to the above plan for the following reasons of soundness. I don’t think that releasing 45 acres of green belt to provide over 456 houses has been thought through. I can’t see that the increase in traffic through the village has been tested on the capacity of the road and on the junctions and roundabouts in the area. The release of the green belt and its effect on the community has not been considered. The idea that land to the east of the M56 to be kept in green belt does not justify that land the west of the road is available to be declassified as green belt.

I can’t see that the council plan proves that there is exceptional circumstances to release this green belt area when there are more than sufficient brownfield sites to accommodate the required number of new houses within the Borough. There are also many houses within the Borough that are empty and could be brought back into use such as at Liverpool and Hull and this does not seem to have been taken into consideration. In view of this and many other reasons I object to this plan.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5034 Ms Elizabeth Anne Latham**

Number of supporters:

Commenting on

HS2

H71; H72; H73

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir/Madam

Response to Rossendale Council's Draft Local Plan August 2018

I believe that the proposal to release Green Belt land in Edenfield does not meet the soundness test for the following reasons:-

- There are enough developable sites (brownfield and other) in Rossendale to meet the needs without releasing Green Belt land
- There are over 1000 empty homes which should be taken into account when assessing housing supply
- The council have not demonstrated that exceptional circumstances exist
- Using the A56 as a Green Belt boundary does not justify the release from Green Belt of the land to the East of it
- It is untrue that the release of the Green Belt will only have minimal impact on openness
- Transport access arrangements for strategic development in Edenfield are inadequate and were not considered or tested by the council prior to proposing the allocation
- The impact of strategic development in Edenfield on the junctions and roundabouts in the area was not fully tested by the council before proposing the allocation

Please reconsider the proposals.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5103 Mr Trevor Latham**

Number of supporters:

Commenting on

HS2

H71; H72; H73

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir/Madam

Response to Rossendale Council's Draft Local Plan August 2018

I believe that the proposal to release Green Belt land in Edenfield does not meet the soundness test for the following reasons:-

- There are enough developable sites (brownfield and other) in Rossendale to meet the needs without releasing Green Belt land
- There are over 1000 empty homes which should be taken into account when assessing housing supply
- The council have not demonstrated that exceptional circumstances exist
- Using the A56 as a Green Belt boundary does not justify the release from Green Belt of the land to the East of it
- It is untrue that the release of the Green Belt will only have minimal impact on openness
- Transport access arrangements for strategic development in Edenfield are inadequate and were not considered or tested by the council prior to proposing the allocation
- The impact of strategic development in Edenfield on the junctions and roundabouts in the area was not fully tested by the council before proposing the allocation

Please reconsider the proposals.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5111**

Anne

Cheetham

Number of supporters:

Commenting on

HS2

H71; H72; H73

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

To the Team

Forward Plan Rossendale
2020-2025 etc.

Removing Green Belt into Urban Belt = Edenfield

As an elected representative for the Eden Ward for a number of years and lived in the village for over fifty-three years.

I have watched the village grow through various pockets of land becoming available eg off Gincroft Lane is a start – Boundary Edge and Heycrofts both open land – one partial “Brown Site” offer a small holding without protest – just comments with regard to the infrastructure – still not taken into account as such.

The name reflects its topography, surrounded by hills ancient highways dipping down its valley area – never short of surface water. Watched the development on Scout Moor for the Wind – but in some instances this enhanced the water flow from the hillsides.

Taking away the fields from Green Belt which is a refuge for leisure pursuits as well as agriculture in its different forms.

Brownfield areas should be number one priority wherever in Rossendale. The residents in this village have acknowledged this over the years – we have seen the Mill Hamlets developed some successfully and others causing some difficulties eg Dearden Clough.

I am very much aware we need housing to accommodate our social change but not the detriment of destroying our landscape for which we are known, and protected to a degree.

The Borough wishes for a cleaner and GREEN Borough – not filling it with lots of undistinguished buildings which do not blend in with characteristics of the majority of the current properties on the main thoroughfares – random stone.

1. Infrastructure – imperative – water – gas – electricity – telephone + ROADS – lanes, pavements

2. Landscape – where does the water go if no proper drainage

3. Highways – Bypass was to alleviate traffic through village – now a partial “rat run” when accidents occur on the Bypass. PARKING for current residents does not exist.

Much more research needs to be done BEFORE TOO MUCH GREEN BELT IS RELEASED – the Horse and Jockey Development on Market Street currently has caused many discomforts for the neighbours already – and that is a modest development BROWN first of ALL.

Yours sincerely,

Anne C. Cheetham

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference	5213 Mr J. Hignett	Number of supporters:
Commenting on	HS2	H71; H72; H73
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer
Does the Local Plan complies with the duty to co-operate? Did not answer		
Turning to the proposed development of green belt land in Edenfield for housing development; there appears to be no recognition of the impact such a large development would have on Turn Village, specifically, the additional load on utilities, access and congestion.		
I ask that the proposal is reconsidered, particularly in light of the recent announcement by government that the numbers for increases in housing stock were incorrect and too high, being based on flawed data.		
Do you wish to participate to the Examination In Public?	Did not answer	Reasons

Reference	5214 Mrs C. E. Hignett	Number of supporters:
Commenting on	HS2	H71; H72; H73
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer
Does the Local Plan complies with the duty to co-operate? Did not answer		
Turning to the proposed development of green belt land in Edenfield for housing development; there appears to be no recognition of the impact such a large development would have on Turn Village, specifically, the additional load on utilities, access and congestion.		
I ask that the proposal is reconsidered, particularly in light of the recent announcement by government that the numbers for increases in housing stock were incorrect and too high, being based on flawed data.		
Do you wish to participate to the Examination In Public?	Did not answer	Reasons
H71; H72; H74		

Reference **61 Mr David Clements** - Number of supporters:
Commenting on - H71; H72; H74
Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. There are sufficient developable brownfield and other sites within the Borough to satisfy housing need without the need to release Green Belt land for development.

2. There are over 1,000 empty homes in Borough that have not been taken into account when assessing housing supply. 3. The Council have failed to demonstrate that 'exceptional circumstances' exist to propose the removal of Green Belt in the Borough and therefore the proposal is contrary to national planning policy. 4. The A56 as a possible Green Belt boundary does not justify the release of the land to the east of it from Green Belt. 5. The contention that the release of the Green Belt will have only minimal impact on openness is unfounded. 6. The transport access arrangements for strategic development in Edenfield are inadequate and have not been tested or considered by the Council before proposing the allocation. 7. The impact of strategic development in Edenfield on the junctions and roundabouts in the area have not been fully tested by the Council before proposing the allocation. 8. Following the flooding in the Rossendale Area on Boxing Day 2015 when ground and surface water couldn't drain away because of the high levels of the Rivers Ogden and Irwell resulting in a number of houses in Irwell Vale and surrounding local communities being flooded the plan does not include viable plans to ensure this doesn't happen again following the very significant development of up to 456 houses in Edenfield.

Detailed in Section 8

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **62 Mrs Pauline Clements** - Number of supporters:
Commenting on - H71; H72; H74
Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. There are sufficient developable brownfield and other sites within the Borough to satisfy housing need without the need to release Green Belt land for development.

2. There are over 1,000 empty homes in Borough that have not been taken into account when assessing housing supply. 3. The Council have failed to demonstrate that 'exceptional circumstances' exist to propose the removal of Green Belt in the Borough and therefore the proposal is contrary to national planning policy. 4. The A56 as a possible Green Belt boundary does not justify the release of the land to the east of it from Green Belt. 5. The contention that the release of the Green Belt will have only minimal impact on openness is unfounded. 6. The transport access arrangements for strategic development in Edenfield are inadequate and have not been tested or considered by the Council before proposing the allocation. 7. The impact of strategic development in Edenfield on the junctions and roundabouts in the area have not been fully tested by the Council before proposing the allocation. 8. Following the flooding in the Rossendale Area on Boxing Day 2015 when ground and surface water couldn't drain away because of the high levels of the Rivers Ogden and Irwell resulting in a number of houses in Irwell Vale and surrounding local communities being flooded the plan does not include viable plans to ensure this doesn't happen again following the very significant development of up to 456 houses in Edenfield.

see section 8 (Reasons)

Do you wish to participate to the Examination In Public? **No** Reasons -

H72

Reference **11 Mrs Kathleen Shaughnessy** -

Number of supporters:

Commenting on -

H72

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The proposal to release Edenfield's green belt land for development is unsound. There are enough brownfield and other sites in the borough which would benefit from development and over 1000 empty properties, and these together would satisfy housing need. The Council has failed to properly assess the massive impact a 50% increase in population will have on the already huge volume of traffic in and through Edenfield. The release of green belt land will cancel out Edenfield's openness and reduce it to a link between Rawtenstall and Bury.

Reconsider the need to release green belt land and actively consider the other options you have and properly assess the implications this plan will have on the area

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	28 Mr Paul Bradburn	Edenfield Village Residents Association	Number of supporters:
Commenting on	-	H72	
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	Yes

Response of Edenfield Village Residents Association to Rossendale Council's Pre Submission version of its (Regulation 19) Draft Local Plan We write to oppose the provisions of this plan which proposes to remove approximately 45 acres of land from the Greenbelt west of Market Street Edenfield to allow the building of hundreds of houses. This allocation was included in the Council's first Draft Plan (regulation 18) in 2017 and we as a group opposed this because if implemented it would radically alter our village, completely changing its character by increasing the population by approximately 50% and the built up area by almost 100%. Over 800 people from the village objected to this particular proposal and this represented almost 30% of all objections received by the Council from the Borough whilst Edenfield amounts to about 3% of the population. The main concerns were the scale of the proposal, the problems of traffic which would flow from it, the impact on the landscape and education, however in spite of this substantial number of objections the Council chose to ignore them. We accept that the education issue i.e. where will all the children from the new houses go to school could be solved after the plan is approved but see no solution to the other three matters. Clearly the "Greenbelt" issue is at the heart of this question. Under Nation Planning Policy Framework guidelines the Council has to establish that there are "Exceptional Circumstances" that justify the release of this land for housing. Our colleagues on the Edenfield Community Neighbourhood Forum have been talking to the the Council, both planners and politicians, on a number of occasions in recent months and each time the Council has been unable to explain what the exceptional circumstances are. As late as 11 July 2018 the full Council met to consider the Draft Plan and decided to approve it in spite of it being incomplete and it not including this vital piece of information about the exceptional circumstances. So we have only discovered how the Council sees this issue with the publication of the Regulation 19 document. We had expected therefore a clear and unequivocal statement of what these Exceptional Circumstances are, but they are very difficult to discern, nowhere is there a clear exposition of the Council's case. On page 15 of the Regulation 19 Document it states that "Exceptional Circumstances" are considered to exist that justify the proposed releases" It goes on the talk about a "balanced porfolio of sites" and the need to "address past under delivery" These issues are surely part of normal planning processes and cannot be decribed as "exceptional" Further down the page, the justification is claimed to be as follows; "At Edenfield the justification for Greenbelt release relates to the strong defensible boundary of the A56" (the proposed new boundary of the Greenbelt) which implies that the reason for the change is to make the Greenbelt boundary more defensible and that, by implication, the removal of the land in between the old and new Greenbelt boundary for development is purely incidental. It also states that the opportunity to have a Master Plan to produce a High quality Development which minimises the impact on openness. We would have thought that the Council would always strive to achieve "High Quality" developments and therefore this is clearly unexceptional. As regard "minimising the impact on openness", again we would have thought that this would be an aim of most planning policies and so again this is unexceptional. At best the Council's justifications are weak and can in no way be described as meeting the "exceptional circumstances" test. The Greenbelt Topic paper issued with the Regulation 19 document provide some insight into the Council's thinking on the Greenbelt issue. It states on page 22; • (the greenbelt site west of Market St, our brackets) is located in the popular Southwest of the Borough where there is high demand, • Given the substantial number of houses proposed in the East of the Borough the site helps to ensure a balanced supply between the east and west of the Borough, • The site is large enough to ensure a mix of housing types and sizes, including affordable provision, in an area of the Borough where affordability ratios are highest. These are all desirable aims but should be acheived through normal planning processes and do not constitute "Exceptional Circumstances" It might be relevant to quote from some of the case law judgements mentioned on page 8 of the Topic Paper, viz; "General Planning merits cannot be exceptional circumstances" "it is not enough for a local authority or inspector to assert that exceptional circumstances exist: it is not possible to convert unexceptional circumstances into exceptional circumstances simply by labelling them as such" It seems to us that the Council did not consider these two passages before preparing its plan. We would add that housing need on its own does not constitute "exceptional circumstances". Regarding the traffic issue, we have asked the Council about this and have received a fairly standard response which is that this will be dealt with after the plan is approved and individual planning applications are made. We accept that this is the normal procedure for many planning applications, but as this is a major strategic development we would argue that a full study should have been completed to establish whether the limited road infrastructure in Edenfield could cope with the inevitably large increase in traffic which would be generated by the hundreds of new houses on this proposed development. From the density of houses outlined in the plan it is

clear that many of them would be 3/4/5 bedroom detached dwellings and the Council's own guidelines require on site parking for three cars on all houses with over three bedrooms. So clearly there are would be many hundreds of extra car journeys coming out onto Market Street and Blackburn Road, in the morning rush hour and back in the evening. The council commissioned a preliminary study of the impact of the plan on all the major junctions in the Borough and this concluded that the junction at Market Place where Market Street, Bury Road and Rochdale Road meet, would experience problems after year five of the build out but no further work has been done. In light of this and the limited scope for road widening we believe that the Council should have commissioned a full in depth study to establish whether the huge volume of extra traffic could be accommodated. In the absence of such a study we believe the plan is unsound. It might be reasonable to ask if the houses are not to go in Edenfield, then where should they go? There are two possible sources of housing supply and the first is empty homes. At the end of 2017 there were over 1000 empty homes in Rossendale and the Council as part of its plan had the option of including bringing some of these dwellings back into use as part of its proposals to meet housing need. And whilst it would be unreasonable to include all of these we would suggest that 20/25% of this total would be reasonable, but the Council has declined to use this option preferring instead to use irreplaceable Greenbelt. The second source of housing supply comes from within the sites of Brownfield land available to the Council and we believe there is adequate flexibility to allow for at least some of this land to be allocated for housing to obviate the need to use irreplaceable Greenbelt. And it should not be forgotten that Brown field land should be prioritised wherever possible over the Greenbelt. To examine this we need to go back to the Regulation 18 Plan (2017) where the housing need total was assessed at 3622 dwellings plus a number to make up for under delivery of the previous Plan to make a total of 3975. Between production of this Plan and the 2019 Regulation 19 Plan the government changed its method of calculating housing need and this reduced the total along with eliminating the need to making up for under delivery on the previous Plan and this made for a new total of 3180, a reduction of 795 plots. Also in the Regulation 18 Plan was a list of 18 sites seen as being "deliverable, developable and viable" which were not included in the Council's figure of 3622, we assume they were being retained as a contingency. Going back to the Regulation 18 Plan the Council have since reassessed its plans and removed 595 plots for various reasons including highway issues, flood risk, contamination. Furthermore the Brownfield and Mixed Site List in the regulation 19 Plan sees several sites reclassified from housing to employment use and this removes about 650 plots from the plan. We suggest that within these figures, the 595 and the 650, and the return to use of empty houses there is sufficient capacity to avoid the need to build on the Greenbelt. In conclusion, the plan to remove 45 acres of land west of Market Street Edenfield is unsound because the Council has failed to demonstrate that "Exceptional Circumstances" exist to justify it and that the circumstances they do quote are not "fully evidenced and justified" and therefore that part of the plan does not meet National Planning Policy Framework requirements and is therefore unsound and should be rescinded added to which there is adequate capacity elsewhere as demonstrated above to allow the Council to meet its target. Further, the Council has not demonstrated that the traffic issue can be solved and that again, therefore the plan is unsound. Removing land from the Greenbelt should be a last resort but it seems that the Council decided to do this first and try to work up the case for doing it afterwards and in this they have conspicuously failed. There are alternative ways of meeting housing need in the Borough but Rossendale Council have, for their own reasons chosen to ignore them. Paul Bradburn Chairman Edenfield Village Residents Association. September 2018

For reasons mentioned above we consider that the removal of the 45 acres of land west of Market Street Edenfield from the Greenbelt goes against the National Planning Policy Framework and therefore the Plan is unsound.

Do you wish to participate to the Examination In Public? Yes

Reasons To explain in more detail to the Inspector, if he requires it the reasons why we find the Plan unsound.

Reference	45 Ms	Nadia	Krasij	-	Number of supporters:
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Commenting on	-	Appendix E 2018 Update	H72
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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IMPACT ASSESSMENT ON SHLAA16256 and SHLAA16258 by Penny Bennett Both sites considered unsuitable on landscape grounds due to moderate to major adverse impact on vistas and footpaths not only to residents but also to walkers using footpaths 130, 136, 138, 139, 141 and 142. In addition to this these plots have been identified as “the only point” in the ribbon development of the village of Edenfield “where views open up” The ribbon development is also described as “unusual because it is classified as Ancient and Post Medieval settlement”. This would all be lost forever should development be allowed on these two plots. The proximity of the A56 to this site does not mitigate development. No justification is given for the removal of this land from Greenbelt status other than the presence of the A56 but the bypass does not impact vistas as much as development would.

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Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	59 Mr.	Peter	Hardman	-	Number of supporters:
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Commenting on	YES	YES	H72
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Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	No
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I don't mind houses being built on the fields at the land west of Market St, Edenfield but it's the sheer number that is grossly out of proportion with the rest of the village and would cause chaos to the current infrastructure. To the best of my knowledge no alternative road improvements have been mentioned or thought about or an additional access to the Edenfield by-pass which would have to be mandatory if the development was to go ahead. Bear in mind the by-pass is already at saturation point throughout certain times of the day and this development would cause chaos in the whole area. However, the trump card, in my opinion for the protesters against the development is the recent survey carried out by the Government body that has confirmed that Rossendale is the most congested town in the country. Therefore, that number of houses cannot be given the go-ahead in Edenfield, end of argument. Many thanks Peter Hardman

Modifications would have to be made to alleviate the additional traffic congestion created in the Edenfield area.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	72 Mr Alexander Stewart	-	Number of supporters:
Commenting on	-	H72	
Is the Local Plan legally compliant?	No	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	Yes
<p>The draft Local Plan in respect of the proposal to release Green Belt land in Edenfield for development is unsound for a multitude of reasons including the following:</p> <p>–1. We consider there are sufficient developable brownfield and other sites within the Borough to satisfy housing need without the need to release Green Belt land for development. 2. There are over 1,000 empty homes in Borough that have not been taken into account when assessing housing supply. 3. The Council have failed to demonstrate that ‘exceptional circumstances’ exist to propose the removal of Green Belt in the Borough and therefore the proposal is contrary to national planning policy.</p> <p>4. The A56 as a possible Green Belt boundary does not justify the release of the land to the east of it from Green Belt. 5. The contention that the release of the Green Belt will have only minimal impact on openness is unfounded. 6. The transport access arrangements for strategic development in Edenfield are inadequate and have not been tested or considered by the Council before proposing the allocation. 7. The impact of strategic development in Edenfield on the junctions and roundabouts in the area have not been fully tested by the Council before proposing the allocation. 8. Following the flooding in the Rossendale Area on Boxing Day 2015 when ground and surface water couldn’t drain away because of the high levels of the Rivers Ogden and Irwell resulting in a number of houses in Irwell Vale and surrounding local communities being flooded the plan does not include viable plans to ensure this doesn’t happen again following the very significant development of up to 456 house in Edenfield.9.</p> <p>-</p>			
Do you wish to participate to the Examination In Public?	No	Reasons	-

Reference **73 Mr Gary Stewart** - Number of supporters:

Commenting on - Soundness of Plan H72

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

The draft Local Plan in respect of the proposal to release Green Belt land in Edenfield for development is unsound for a multitude of reasons including the following: –1. We consider there are sufficient developable brownfield and other sites within the Borough to satisfy housing need without the need to release Green Belt land for development.

2. There are over 1,000 empty homes in Borough that have not been taken into account when assessing housing supply. 3. The Council have failed to demonstrate that ‘exceptional circumstances’ exist to propose the removal of Green Belt in the Borough and therefore the proposal is contrary to national planning policy. 4. The A56 as a possible Green Belt boundary does not justify the release of the land to the east of it from Green Belt. 5. The contention that the release of the Green Belt will have only minimal impact on openness is unfounded. 6. The transport access arrangements for strategic development in Edenfield are inadequate and have not been tested or considered by the Council before proposing the allocation. 7. The impact of strategic development in Edenfield on the junctions and roundabouts in the area have not been fully tested by the Council before proposing the allocation. 8. Following the flooding in the Rossendale Area on Boxing Day 2015 when ground and surface water couldn’t drain away because of the high levels of the Rivers Ogden and Irwell resulting in a number of houses in Irwell Vale and surrounding local communities being flooded the plan does not include viable plans to ensure this doesn’t happen again following the very significant development of up to 456 house in Edenfield.9. The plan does not appear to take into account the major implications of its implementation on the local infrastructure(eg schools, doctors, dentists and other health provision). In addition traffic flow and parking would be adversely affected by the proposed development of the area.

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Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	93 Miss	Jane	Hartley Jacques	Number of supporters:
Commenting on	SHLAA16256, SHLAA19262		Rossendale emerging plan	H72
Is the Local Plan legally compliant?	No		Is the Local Plan sound?	No
				Does the Local Plan complies with the duty to co-operate?
				No
<p>There is just no exceptional circumstance to take this land out of greenbelt for building. The council have provided no evidence for this The A56 does not make a defined boundary. Building could continue over the A56 or over the other side of Blackburn Rd. Rossendale council have not taken into full account infrastructure needs for roads and schools. Lancashire CC officer stated this was necessary. Rossendale council's own studies have shown the roundabout at Rochdale road Edenfield would be at capacity in around 5 years. Rossendale have not worked with Lancashire CC on road infrastructure. There had been no work on infrastructure or future work and running on Edenfield primary school. Single or split site and the challenges that will bring. Lcc and ofsted should have been consulted Blackburn road has challenges for traffic with a traffic light junction at the top, the road going down hill, on a bend, under the motorway bridge. On the opposite side to the site are 3 exits, Esk Ave, Vale Ct and 2 semis. On the Blackburn Rd side are 5 terraced houses. There are also cycle paths on either side of the road The safe siting of an exit road from the development needs consultation with Lancashire CC. to see if it can safely go in. Rossendale should have done this. Rossendale council have put a speculative siting for a commuter link station on the East lanc railway at the old Edenfield station down Blackburn Rd. In the rossendale infrastructure plan this links estimated cost will be in excess of 50 million pounds and require a subsidy of 500,000 pounds annually. The train would run for a few hours a day to bury and back. If this happened this would increase traffic on the Edenfield area and down Blackburn road. However in a meeting with transport for greater Manchester in 2012 upgrading the line was found not to be good value for money. To have such plans for a rail link in housing infrastructure plans is unsound and cannot be justified by Rossendale council. There is nothing to support the inclusion of it. Rossendale council are being misleading to hold this train link out as an infrastructure project for rossendale. There is also transport for the infrastructure housing plan . Rochdale council and Bury council and east land railway and tfgm are consulting parties There is no health and safety plan eg how is pedestrian safety maximised? How is cycle safety maximised? Parents and buggy's/ children Elderly Runners Community groups were not consulted, eg disability and access Lancashire CC gave advice on this and should have been followed. It wasn't and so has left to exclusion and health and safety issues Lack of access This has led to legality issues and inequality issues. With the market St site access is also poor. The original surveyor specifically notes the need for a "careful consideration with respect to wider to wider infrastructure and capacity for the local school." Rossendale council have not considered the local infrastructure in Edenfield. All housing on rossendale greenbelt should be affordable housing. Will rossendale council abide by this if building goes ahead? It would be unsound and unjustified not to.</p> <p>Build on non green belt sites Build on brown field sites This will remove the building on green belt without the exceptional circumstance, which is happening here. Do not regard the A56 as a defined boundary. It isn't. Plan infrastructure, with roads and schools and health services on a master plan before any building in rossendale. Just because schools and roads and GPs already exist does not mean they will be adequate. Rossendale own studies show this not to be so. Health and safety studies and equality impact studies should be done on both the transport infrastructure and the housing plan. Disability housing should be adequate in number, not tokenistic. Will all sectors of the community be built for and given supported services? Remove the commuter link on the East lanc railway from rossendale to bury. This is an unrealistic project.</p>				
Do you wish to participate to the Examination In Public?	No		Reasons	-

Reference **98 Miss Donna Kean** - Number of supporters:

Commenting on Edenfield - H72

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I believe the proposal to build 456 houses on green belt land in the area west of Market Street, Edenfield to be unsound as it is completely disproportionate to the existing community as it will virtually double the size of the village, "village" being the operative word. There are over 1000 empty homes in the borough, so why are more necessary specifically in Edenfield and to the proposed magnitude? The fact that this development is also proposed on green belt land is also completely appalling and there is insufficient justification for removing this land when there are brownfield and other sites within the borough that could be developed.

The local plan could be made more sound by not building on green belt land and instead using other developable sites available. Do not build 456 houses in Edenfield village and instead review utilisation of existing empty homes in the borough and how their occupancy can be optimised.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **121 Mrs Helen Iggulden** Number of supporters:

Commenting on HS2 H72

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

"I appreciate there is a need for housing development but it is the scale of development in a small village. The planned 450 houses would increase the residential capacity by almost 50% with scant regard for the road safety of its population. There is one narrow road through the village, houses on either side, parked cars on both sides and no other access road to the village. As far as I understand, access from the bypass has been discounted as there are already concerns about bypass safety and the number of exits and slip roads to this bypass. Secondly, what infrastructure is planned? Where would the facilities to meet the educational needs of primary school children in the families who would live here? My third point relates to the objections around releasing Green Belt land, when there are already up 1000 empty properties in the borough. Fourthly on Brownfield sites in the area there has been successful development. There is ongoing development and potential for further development. This approach is successful in scale, and these smaller scale projects ensure that there are no traffic bottlenecks, preserve the character of the village, and respect the environmental integrity of the area."

Do you wish to participate to the Examination In Public? **No** Reasons

Reference **5173**

Taylor Wimpey

Number of supporters:

Commenting on

HS2

H72

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Land West of Market Street Edenfield

Policy HS2: Housing Site Allocations

2.28 Taylor Wimpey wholly support the allocation of the Land West of Market Street, Edenfield (H72) for residential development, and we discuss this site, and its delivery assumptions in more detail in Sections 3 of these representations.

2.29 We would also reiterate our comments on policy SD2 in that we fully support the Council's acceptance that Green Belt release is necessary, and that the policy wording and evidence base clearly demonstrate that exceptional circumstances exist in Rossendale which justify this.

2.30 Looking at the allocations themselves, there are 78 in total, with an expected capacity of 2,853 dwellings at an average density of 53 dph; which falls short of meeting the proposed housing requirement of 3,180 dwellings in full.

2.31 The supporting text confirms that the table includes extant planning permissions which have not been started or are still being built out and are not expected to be completed this financial year. Given this, it is not entirely clear how the Council intend to deliver the remaining 327 dwellings to fulfil the suggested housing requirement figure of 3,180 over the Plan Period.

2.32 Whilst it can be assumed that the remaining housing requirement will be delivered in the form of windfall development, Policy HS2, the supporting evidence base and the housing trajectory in the Regulation 19 plan do not make this clear. We therefore ask for further clarity from the Council as to how the overall housing requirement figure of 3,180 will be met in Rossendale. Furthermore, we express further concern about the assumptions made regarding housing supply and delivery, which we consider to be overly optimistic and do not provide enough flexibility/certainty that emerging development requirements will be met. We explore this in the following section (discussion relating to the housing topic paper).

2.33 We have already outlined why there are compelling reasons as to why Rossendale should adopt a Housing Requirement which goes above and beyond the figure of 212 dwellings per annum, as suggested by the Government's standardised housing calculation. This alone indicates that the Council will need to allocate additional sites to meet its basic requirements.

2.34 Furthermore, the NPPF is categoric that housing requirement is a minimum figure which Local Plans should seek to surpass, and this interpretation has been endorsed in numerous Local Plan examinations. Exceeding the basic requirement also generates a buffer in the supply and gives flexibility within the plan to take account of under-delivery and to provide additional choice in the market.

2.35 A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Such an approach is recommended within the LPEG report to Government (dated March 2016), with recommendation 40 (at Appendix A) noting that Local Plans should:

"focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF. Reserve Sites represent land that can be brought forward to respond to changes in circumstances."

2.36 As such the Council should consider allocating additional sites over and above its housing requirement. Based on the Council's current requirement a 20% uplift would require allocations for up to 3,816 dwellings and based on the claimed supply of 2,853 would require land for approximately 963 additional dwellings to be identified.

2.37 A higher requirement of 269 dpa, which is suggested as a minimum in our economic analysis, would give an overall requirement of 4,035 (rising to 4,842 with a 20% buffer) and could therefore require land for a further 1,989 units to be identified.

2.38 Finally, it must be noted that an average density of 53 on the proposed allocations appears high, and may not be achievable, meaning that further land would need to be identified.

5 Year Supply - Housing Topic Paper

2.39 Moving on to the Council's August 2018 Housing Topic Paper, paragraph 3.5.9 states that when utilising the government's standardised housing requirement figure and adding a 20% buffer to account for historic under-delivery, the minimum number of dwellings to be provided within the first five years of the plan is 1,272 dwellings. Paragraph 3.5.10 later confirms that 1,643 dwellings are likely to be delivered between years one to five of the plan period (2019-2024), proceeding to suggest that this indicates that the Local Plan is allocating enough sites to provide a healthy land supply in the first five years.

2.40 We have several concerns with this approach. Firstly, it has already been demonstrated that there is evidence to support the Council deviating from the government's standardised housing methodology requirement, which we reiterate is only a minimum figure. In fact, there is strong evidence to support the Council exceeding the minimum requirement of 212 dwellings per annum, to deliver a housing target and Local Plan which is ambitious as well as realistic, taking into account previous economic growth figures which are not accounted for at all within the standardised methodology approach. We have already expressed our concerns regarding the government's standardised approach, which only looks at demographic trends alone, and have recommended a minimum figure of 269 dpa to meet economic growth aspirations as set out in the SHMA and fully supported by the revised NPPF and NPPG.

2.41 Secondly, these figures do not take account of any historic under delivery, even though tables 1 and 6 clearly demonstrate substantial under delivery in the previous 3 years (totalling 278 or 37.5% against the Core Strategy target of 247, and 357 or 43.5% against the Core Strategy trajectory). When this is taken across the full Core Strategy period from 2011 the total shortfall is 523 units (based on this topic paper and the May 2017 5 year supply statement), and this must be taken account of in the 5 year supply calculations.

2.42 Thirdly, we have concerns with the level of supply claimed within the trajectory (1,643). The main issue is that this is almost entirely made up of allocations, however the glossary of the revised NPPF clearly confirms that Local Plan Allocations can only be included where there is clear evidence of delivery. Such evidence has not been provided and as such it is arguable whether these sites can be included in full. A common approach is to apply a discount to the claimed supply to allow for some under delivery which is inevitable, particularly on sites that don't have planning permission (as many of these allocations don't), and a 10% lapse rate is generally advocated by S78 Inspectors and would be appropriate here given Rossendale's physical constraints and historic under delivery.

2.43 Based on the above we have calculated Rossendale's Housing supply as below, which generates a figure of 3.89 years based on the 212 dpa target, and 3.29 years based on our recommended minimum target of 269 dpa; suggested that additional sites need to be identified or brought forward to deliver within the first 5 years of the plan period.

Figure 2.1 – Rossendale's 5 Year Housing Land Supply

2.44 We would also highlight that the Housing Topic Paper does not include a full 5 year supply update and as such the latest formal evidence on this is the Council's 5-Year Housing Land Supply Report (2017-2022) dated May 2017, which claimed between 2.4 and 2.6 year supply, whilst our analysis suggested this was between 2.11 and 2.33 years.

2.45 In short there are acute supply issues in the area that should be addressed at the earliest opportunity.

3. LAND WEST OF MARKET STREET, EDENFIELD (ALLOCATION H72)

3.1 Taylor Wimpey are the legal owner of a 12.5 Ha Green Belt site west of Market Street, Edenfield.

3.2 The site was submitted to the Council's call for sites process in June 2016 and this was followed with the submission of a Development Statement in September 2016, which is attached at Appendix 1.

3.3 The site (SHLAA Ref: 16202) is now proposed as part of large housing allocation Site H72, which covers 15.25 hectares of gross site area across three individual sites. The combined allocation has an indicative capacity of 400 dwellings, which accounts for 12.5% of all the allocations in the Borough, indicating its importance to the delivery of the plan. This is also reflected in Policy HS3, which we address on the next page.

3.4 It must also be noted that this allocation will be important for the delivery of the type of aspirational family housing in Rossendale which is currently lacking, and this will

serve to improve its Council Tax profile and increase receipts.

3.5 Of further note, the indicative dwelling capacity represents a decrease of 51 dwellings from the Regulation 18 Local Plan consultation, which suggested an indicative capacity of 451 dwellings for the whole site allocation. This is because the Council have removed the northernmost land parcel (Land west of Moorlands View- SHLAA Reference 16255) from the H72 housing allocation. For the reasons we explore below, the remaining H72 allocation remains to be a suitable, deliverable and sustainable development prospect to meet the emerging development requirements of the Borough.

3.6 The attached Development Statement and evidence submitted to date have demonstrated that this is a sustainable and deliverable site in accordance with the NPPF, which is capable of delivering up to 273 units, commencing within the next 5 years. Indeed, Taylor Wimpey own the site outright and therefore there will be no delay in converting the land sale. This will allow the development arm of the business to promote a full application as soon as practically possible post adoption of the Local Plan and its removal from the Green Belt, assuming a separate master planning process, SPD or Design Code is inserted into the site allocation policy.

3.7 We have no comments regarding the information contained in Table 1 in relation to site H72.

Response to the Requirements of Policy HS3: Edenfield

3.8 Policy HS3 is a policy supporting the H72 allocation at Edenfield, which covers 26 hectares of land across three individual sites, being promoted by three separate parties:

- Land off Exchange Street (SHLAA Ref: 16263) – 4.75 Ha – promoted by the Methodist Church;
 - Land West of Market Street (SHLAA Ref: 16262) – 12.5 Ha – promoted by Taylor Wimpey;
- and
- Land between Blackburn Road and A56 (SHLAA Ref: 16256) – promoted by Peel Holdings.

3.9 The Taylor Wimpey site covers the largest site area, at the centre of the allocation. Policy HS3 states that new residential development will be permitted in this area subject to specific criteria and we address these in turn below.

a) Comprehensive development of the entire site is demonstrated through a masterplan

3.10 Policy HS3 outlines how the Council expect to see comprehensive development of the full allocation through a masterplan.

3.11 Taylor Wimpey are committed to this comprehensive approach and have engaged with the other key landowners listed above. As part of the current consultation we have produced a Joint Concept Masterplan (attached at Appendix 2) and Joint Highway Impact Study (to follow as agreed at Appendix 3), alongside the Methodist Church (who control the land to the south off Exchange

Street). The parameters and scope of this Joint work was informed by a meeting with Rossendale Council Officers on 14th September 2018.

3.12 It must be noted, that Peel Holdings are progressing their proposals to the north (land between Blackburn Road and the A56) through a separate master planning process. As such the proposals shown on this site within the plan at Appendix 2 simply reflect previous masterplan submissions made by Peel Holdings and have been integrated with the wider development on that basis.

b) The implementation of development in accordance with an agreed Design Code

3.13 We are in agreement with the majority of the Design Code principles listed here, but reserve the right to make further, more detailed comments as these criteria are refined and as the master planning process progresses.

3.14 We would also reiterate our earlier comments that Design Codes and other additional policy documents can add an additional layer of complexity and lead to delays in the delivery. In this instance, we agree that some form of design framework is necessary given the size of the site, albeit it is possible this could be secured through a detailed masterplan and could be controlled through a policy in the Local Plan rather than necessitating a separate document to be prepared and adopted by the Local Authority post adoption of the Local Plan.

3.15 We have a particular comment in relation to part t, which states 'provision for a one form entry Primary School on site if Edenfield Primary School cannot be expanded to the required level'. This is a new introduction to Policy HS3 from the Regulation 18 consultation.

3.16 In relation to educational matters, we take note of the findings of the August 2018 Rossendale Infrastructure Delivery Plan, which has been published as part of this consultation exercise. Page 8 of the document states the following:

“LCC have indicated that if the planned level of development proposed at Edenfield goes ahead they may require either a school extension or a new school...LCC would initially look to provide expansions at existing school sites where appropriate”

3.17 It is clear therefore, that Lancashire County Council would prefer to expand the existing primary school in Edenfield in the first instance, as opposed to providing a new school on a site elsewhere.

3.18 Furthermore, Taylor Wimpey have commissioned an Education Report from EFM (attached at Appendix 4) which confirms that based on the level of future need, expansion is likely to be more appropriate than a new facility and could be funded through Section 106 contributions. The conclusions at section 12 confirm:

- From a Primary School perspective, planning obligations are justified due to a lack of provision currently available to serve this development. There are options for how this contribution could be utilised: expanding existing provision at one of the local schools, relocating existing provision on to this site, or creating new provision on this site. Due to the number of pupils this development is expected to generate, and the cost implications of the projects, it would make most sense to expand existing provision. This would also remove the need for land to be provided on this development, much of which would need to be purchased by LCC at full market value. Further discussions would need to be undertaken with LCC in order to establish their preference, and the feasibility of school expansions.
- From a Secondary perspective, planning obligations are justified due to the current lack of capacity at the catchment Secondary School, and the forecast increase in rolls by the time this development is expected to generate pupils. LCC will need to identify a scheme at a school that will serve this development to ensure that the obligation is CIL Regulation 122 compliant.
- From an Early Years/SEN perspective, planning obligations are not justified and are unlikely to be requested.

c) A phasing and infrastructure delivery schedule for the area

3.19 We do not take issue with the infrastructure requirements and phasing considerations listed here; and confirm that these will be agreed and refined with the Council and adjoining landowners as the process progresses. However, we would ask that the Council clarify what format this schedule is intended to take and how it will be monitored and implemented, as again, if it has to go through any formal approval process it could add complexity and cause delays.

3.20 Finally, any infrastructure requirements must be shown to be necessary and proportionate and must take account of viability matters.

d) An agreed programme of implementation in accordance with the masterplan

3.21 We would reiterate our comments from part c above.

e) Identification of mechanisms to enhance the quality of, and access to, Green Belt land

in the area between the development site and Rawtenstall/Haslingden

3.22 This is a new element of policy HS3 which reflects the wording of paragraph 138 of the revised NPPF.

3.23 However the NPPF makes it clear that it is strategic policy-making authorities/Local Plans which should be considering this matter, therefore the onus is not on the Developer/Land Owner to demonstrate that this has been considered or to put forward mechanisms which would help to improve access to remaining Green Belt land within their land ownership.

3.24 Taylor Wimpey are keen to engage with the Council on this matter, however we have concerns with how these mechanisms could be implemented, especially given the land which is under Taylor Wimpey's control. The Taylor Wimpey land parcel does not provide direct access to the green belt areas to the north (Rawtenstall/Haslingden area), therefore it is unclear what role Taylor Wimpey could play in this regard in terms of on-site contribution improvements.

3.25 Turning to off-site contributions, this would be subject to the Council having control of third party land, which again makes it unclear how financial contributions such as Section 106 Agreements could be used to implement such environmental/access improvements to the remaining Green Belt land between the development site and Haslingden/Rawtenstall.

3.26 We would therefore welcome further clarity from the Council in terms of how such enhancements to remaining Green Belt land could be secured/implemented, and the role that Taylor Wimpey could play in achieving these aims. We also reserve the right to comment on this matter further at a later date.

Evidence Base – Market Street, Edenfield

3.27 We now provide comments on the evidence base documents that assess the Edenfield site including:

- Green Belt Topic Paper, August 2018;
- Green Belt Assessment, November 2016;
- Heritage Impact Assessment of Housing and Employment Sites, August 2018;
- Strategic Housing Land Availability Assessment (Stages 1 and 2), August 2018;
- Sustainability Appraisal and Strategic Environmental Assessment of the Rossendale Local Plan, August 2018; and
- Lives and Landscape Assessment, July 2015.

Green Belt Topic Paper (August 2018)

3.28 This Topic Paper repeats a summary of the key findings of the November 2016 Green Belt Assessment in relation to the Land west of Market Street site, which we comment on in detail below. We support the Green Belt Topic Paper's recommendation to amend the Green Belt boundary to release the Land west of Market Street site for the Green Belt. We fully support the Council's assertion that the H72 allocation is situated in a viable location with willing landowners. We also commend the Council for clearly setting out the exceptional circumstances which exist to support Green Belt release in Rossendale.

3.29 This includes reference to the specific circumstances that support the release of the Edenfield site, and make it such an important allocation, a position we fully endorse:

- It is located in the popular south west of the Borough where there is high demand.
- Given the substantial number of houses proposed in the East of the Borough the site helps to ensure a balanced supply between the east and west of the Borough
- The site is large enough to ensure a mix of housing types and sizes, including affordable provision in an area of the Borough where affordability ratios are highest.

3.30 However, we do express concern with Section 8 (Improving the Green Belt) of the Topic Paper. This relates to paragraph 138 of the revised NPPF. Whilst the Topic Paper provides clarity that contributions to improving the remaining Green Belt in the Borough would more likely be in the form of 'off-site provision', we are concerned about the second paragraph of Section 8. The Topic Paper outlines the following in relation to policy HS3e, which we have already commented on:

"The developers of this site (Edenfield-H72) will be required to identify how they will address this issue (how the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land). The same principle will be expected in other Green Belt locations" (our emphasis)"

3.31 As previously discussed earlier on in these Representations, Paragraph 138 of the revised NPPF makes it clear that it is strategic policy-making authorities/Local Plans which should be considering this matter. It is clear that it is not the developer who should be considering this matter, and it is certainly not the case that the developers are required to identify how they will address this issue. Indeed, such a matter is largely out of the control of developers, who are somewhat limited to the on-site contributions which they could deliver within their own land ownership. The Topic Paper already acknowledges this, saying that such provision is more likely to be 'off-site' and requirement management agreement. Off-site enhancements are largely out of the control of the developers of the Edenfield site, therefore it is unreasonable to suggest that they should identify how they will address such issues.

3.32 Taylor Wimpey are open and willing to engage in dialogue with the Council as to how the Council will identify and implement such compensatory measures. However, we again politely request further clarity from the Council as to how they consider this can be implemented and reserve the right to comment on this matter further at a later date.

Green Belt/Landscape Assessment

3.33 The Council commissioned a Green Belt Assessment (prepared by LUC in November 2016) and Landscape Assessment (prepared by Penny Bennett Landscape Architects in July 2015) as part of their evidence base for the emerging Local Plan.

3.34 Whilst we agree with many of the findings of these two documents, we express concern with some of the conclusions in relation to the Land West of Market Street, Edenfield.

3.35 Randall Thorp have provided a comprehensive rebuttal statement which provides commentary on the findings of these two reports, which can be found in Appendix 5. The Randall Thorp report should be read in conjunction with these representations, and the key findings are summarised as follows:

- The site provides a weak contribution to Green Belt purposes 1 and 3, rather than a moderate contribution as concluded in the 2016 Green Belt Assessment.
- The potential level of harm caused by the release of the site from the Green Belt, in accordance with the 'Framework for assessing harm' at Table 4.2 of the Assessment, should be 'low'. This differs from the findings of the Green Belt assessment which suggests 'medium'.
- The Landscape Assessment's conclusion that the site 'is not suitable for development on landscape grounds' is incorrect. When taking into consideration the broader context of the site in landscape terms as well as proposed mitigation measures, the site is entirely acceptable in landscape terms. The Assessment should therefore conclude that the Market Street, Edenfield site is 'suitable for development with appropriate mitigation'.

3.36 Accordingly, this rebuttal reinforces the Council's conclusions that this is a sustainable and deliverable site with limited landscape and Green Belt landscape terms and provides further justification for its allocation within the emerging Local Plan.

Heritage Impact Assessment of Housing and Employment Sites (August 2018)

3.37 The Land West of Market Street, Edenfield site is assessed in this report under Local Plan Reference H72/SHLAA 16262. The report notes in heritage terms how the site is acceptable if the site is significantly reduced, and the boundary should be pulled south of Mushroom House. We strongly disagree with this statement, namely because Mushroom House is not a Listed Building, nor does it have any other heritage protection. That said, future development proposals and any future Masterplan will carefully consider the impact on Mushroom House, and indeed the adjoining Grade II Listed Building of Edenfield Parish Church to the north.

3.38 The Illustrative Masterplan within the Development Statement outlines how heritage matters (and in particular Edenfield Parish Church) will be addressed within the development proposals through planting and landscape buffers. Future development will also seek to use high quality materials and design which differs from standard modern construction, as suggested by the findings of the 2018 Heritage Assessment.

3.39 Finally, the heritage assessment notes how the houses will be restricted to two stories on the entire site. We consider that this is a blanket statement and too early on in the development control process to conclude that this should be the case on this site. Indeed, the detailed design stage at the Full planning application/Reserved Matters stage would be the most appropriate time to consider detailed height and scale matters and any impact on heritage assets.

Strategic Housing Land Availability Assessment- Stages 1 and 2 (August 2018)

3.40 The site was assessed in the SHLAA under site reference 16262. Whilst we fully agree with the overall conclusions that the site is suitable, achievable and developable in the medium to long term, we have a few comments in relation to some of the findings. The Council already consider this site a suitable housing allocation, however, in our view, the site actually performs even better in certain categories of the SHLAA as explained below:

- Heritage Assets- whilst the site does adjoin the Grade II Listed Building of Edenfield Parish

Church, the scoring of the site as red in this category does not allow for consideration of detailed design matters. Whilst it is appreciated that the remit of a SHLAA is for a highlevel assessment of constraints, further information has been provided in the form of the Development Statement which confirms that this Listed Building has been taken into consideration as part of an Illustrative Masterplan. As such, when taking into consideration design matters and the illustrative masterplan, the site should not score red in the heritage assets section.

- Landscape Value- as noted previously we disagree with the findings of the 2015 Landscape Assessment, which have fed through to the SHLAA noting a 'high landscape impact' and therefore scores red in this regard. The Randall Thorp report (Appendix 5) explains in detail the broader landscape context and landscape mitigation measures which can be implemented on site, concluding that it is suitable for development with appropriate mitigation. In light of these findings, the site will not have a high landscape impact and should not be scored as red in this category within the SHLAA.

3.41 We also consider that the site should have been scored higher in the ecological value and recreational value sections, which are currently amber. This relates to a more general observation that the scoring methodology and scope of the SHLAA does not allow for detailed considerations such as masterplanning and proposed design/mitigation.

3.42 The Illustrative Masterplan illustrates how the existing public right of way does not pose a constraint on site, on the contrary it can be well-integrated into development proposals. Additionally, the Development Statement attached at Appendix 1, which the Council are in receipt of, concludes that there are no ecological constraints preventing the development of the site and that appropriate mitigation will be provided where necessary.

3.43 To conclude, whilst we agree with the overall findings of the SHLAA that the site is suitable, achievable and developable, the comments above further demonstrate this. Accordingly, the evidence base fully supports the Council's decision to allocate this site for housing.

Sustainability Appraisal and Strategic Environmental Assessment of the Rossendale Local Plan (August 2018)

3.44 The Council have commissioned a Sustainability Appraisal and Strategic Environmental Assessment (August 2018) as a key document of the evidence base. We do not have any detailed comments on this document at this stage, other than we would reiterate the point that key aspects such as landscape and cultural heritage will be carefully considered at the detailed design stage, and should ensure the site will score much higher in reality, compared some of the red categories as suggested in the Sustainability Appraisal report.

Joint Highway Impact Study (Croft)

3.45 A Joint Highway Impact Study, commissioned by Taylor Wimpey and the Methodist Church, is being prepared by Croft Transport Planning & Design, to consider the highway impact of the full Edenfield allocation on the local highway network, in line with parameters agreed in a meeting with Rossendale Council Officers on 14th September 2018.

3.46 This work uses the Councils Highway Capacity Study, prepared by Mott MacDonald, as a basis; however the final version of this Study was only published on 2nd October, and therefore it has not been possible to complete this work by the 5th October deadline.

3.47 In light of these delays with the Councils evidence, we have agreed an extension to complete this work, and details of this and the rationale are attached at Appendix 3. Conclusions on Market Street, Edenfield Site

3.48 Overall, Taylor Wimpey are wholly supportive of the Edenfield allocation and are committed to the comprehensive masterplanning process, subject to the comments and queries raised above on Policy HS3 and the evidence base.

4. CONCLUSION

4.1 Overall, Taylor Wimpey fully support the Edenfield allocation (H72) subject to the comments and suggestions made above, which note that:

- The overall housing requirement should be increased to take account of economic aspirations and to provide flexibility to accommodate any unmet need generated by the adjacent authorities in Greater Manchester. Namely, there is strong evidence to justify the Council setting a housing target of at least 269 dpa, which goes above and beyond the government's standardised housing methodology calculation, which we reiterate is a minimum starting point and should not be considered as a cap;
- The Council should consider allocating additional sites, both as long-term reserve sites to provide some headroom in their overall supply, and smaller short term sites to boost 5 year supply, given the existing shortfall.

4.2 This representation has shown that the site is deliverable and developable in line with the NPPF, and has also demonstrated its importance for housing delivery in Rossendale, representing over 9.5% of the total allocated dwelling numbers (with the wider Edenfield Allocation contributing 14%) and will make a significant contribution to 5-year supply.

4.3 Taylor Wimpey have been promoting Edenfield for three years and will continue to work alongside the Council and other respective land owners to demonstrate that it can begin delivering in the next 5 years.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5176 Mr	Warren	Hilton	Highways England	Number of supporters:
Commenting on			HS2	H72	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer

H72 Land west of Market Street, Edenfield

The land being identified for this housing allocation by the Council lies alongside the A56 southbound carriageway at the top of a cutting and is currently undeveloped. We have already made the Council aware that this site is located above cutting of the A56 at Woodcliffe. This cutting, which forms the verge of the trunk road, is subject to existing slope failure issue that Highways England is managing, and a solution is currently at an advanced stage of development. Due to the loading requirement, developing this land could affect the effectiveness of the permanent solution that Highways England is working on.

Highways England is extremely concerned that the additional loading as a result of developing this land would trigger a land-slip that would both affect the safety of A56 and the development itself. Before allocating this land within the merging Plan, Rossendale Council should now carry out a detailed geotechnical assessment (using appropriately qualified geotechnical specialists) to identify and understand the implications for this slope of developing the land above it. This work must be carried out within the parameters of the Design Manual for Roads and Bridges standard HD22/08 'Managing Geotechnical Risk'. This assessment is also needed so that Highways England is able to understand whether its intended solution to the land-slip issue would be likely to withstand the loading caused by developing the land above it. We advise that the Council should not advance the Plan further until the outcome of this assessment is known and has been agreed with Highways England due to the safety issues at stake. There is also a likelihood that the quantum of housing assigned to this allocation will need to reduce as a result.

The complications associated with this site (in particular the Commerce Street access proposal) are so great that, in our view, it is not appropriate for a developer to be faced with attempting to resolve them at planning application stage. They need to be resolved before the site is formally allocated within the Plan, as they are highly likely to affect site viability.

Updated comment:

H72 Land west of Market Street, Edenfield

The land being identified for this housing allocation by the Council is currently undeveloped, and is located alongside the A56 southbound carriageway roughly between where the A56 crosses Blackburn Road to the north and the A56 / M66 Junction '0' so the south. The land forming the proposed allocation is at a much higher level in relation to the A56, which passes through several cuttings.

We have previously made the Council aware that this site is located above a cutting of the A56 at Woodcliffe where, due to the nature of the ground conditions typical throughout the Rossendale valley, the cutting is showing signs of land slippage involving the land beyond the top of the cutting slope, which we are monitoring and have taken steps manage. Highways England is taking action to deal with this problem because it accepts that the alteration of the natural topography when the A56 Edenfield Bypass was built (i.e. to create the cutting), whilst designed properly and to the standards and knowledge of the time, is likely to have been a significant contributory factor, and this serves to illustrate the difficulties of undertaking construction and earthworks in this area.

Whilst the land movement problem at Woodcliffe is correct, we are now clear that adjoining land does not in fact form part of the Council's proposed 'H72' housing allocation site, and so we would not therefore anticipate development within the proposed allocation site to aggravate the existing problems at Woodcliffe or render the management of and intended long term solution to the problem, obsolete. However, the land stability difficulties at Woodcliffe are located immediately to the north of where Blackburn Road crosses under the A56, and are therefore in close proximity to the proposed H72 allocation.

Highways England has good reason to believe that the inherently difficult ground conditions at Woodcliffe extends throughout the land adjoining this part of the A56 in general, including the full length of the proposed allocation.

There are presently no signs of the failure of the A56 slope cuttings along the boundary with the proposed allocation site. However, given these underlying concerns, we are very

concerned that there is a realistic possibility the disturbance caused by earthworks and loading of the surrounding land by building upon (if not considered and managed correctly) would trigger further land slippage problems along the A56 boundary. This is of course a safety concern, both in relation to the users of the trunk road and the residents of any housing – the results of a sudden land failure would be catastrophic. That is beside any gradual movement to the dwellings themselves.

If these problems were to happen, given the change in the dynamic brought about by the development, it would be the original developer(s) and property owner(s) who would be responsible, not Highways England. This is why the Council's evidence base now needs to contain a proper assessment that evidences the physical extent to which this site allocation could be developed without jeopardising the stability of the site itself and the A56 cuttings, and which sets out the approaches that should be taken towards ensuring this during the construction phases (Highways England would expect any subsequent planning applications for this land to be developed and executed in accordance with the findings of this work).

A geotechnical assessment is therefore required, which must be carried out within the parameters of the Design Manual for Roads and Bridges standard HD22/08 'Managing Geotechnical Risk', the findings of which should be agreed with Highways England. We are happy to offer any guidance and information that the Council may require to complete this evidence.

As with our comments in relation to the Carrs Wood, it is essential that this assessment is carried out before the Local Plan is advanced any further. Without this work, Rossendale Council will be unable to demonstrate to an Inspector what viable level of housing the site could deliver towards its Local Plan target. Therefore, it is essential that this work is completed and agreed with Highways England prior to examination of the Plan if the Council is to be able to demonstrate viability.

This is necessary because we have evidence that there are geotechnical constraints at this location of a nature where they will be fundamental to whether the site allocation, as proposed, is deliverable to the extent the Council currently anticipates.

Therefore, it is critical and entirely appropriate that these matters be properly considered as part of the Local Plan development process and not left to for major problems to be identified as part of development management process. This is because, in order for a Local Plan to be adopted, a local planning authority must first be able to demonstrate that its allocations are actually sound and deliverable.

Do you wish to participate to the Examination In Public? Did not answer Reasons

Reference	5197 Mr	Marcus	Hudson	Lancashire County Council	Number of supporters:
Commenting on					H72
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>EDENFIELD – HS2:71 – Each land parcel should be linked to provide maximum permeability in accordance with Manual for Streets and should sites be brought forward piece meal they should be designed with future connectivity in mind.</p> <p>HS2.71 (a) Land north of Blackburn Road – Access and visibility splay onto Blackburn Road appears achievable. Design should futureproof the site for further development to the north. Improvements at Pinfold junction to include signalised pedestrian provision and changes to speed limit on Blackburn Road are likely to be necessary.</p> <p>HS2.71 (b) Land south of Blackburn Road – Access and visibility splay onto Blackburn Road appears achievable. Improvements at Pinfold junction to include signalised pedestrian provision and changes to speed limit on Blackburn Road are likely to be necessary.</p> <p>HS2.71 (c) Land east of Market Street (Mushroom Farm) – site access between Horse & Jockey and 115 Market Street appears achievable. Consideration for existing on-street parking generated by residents of Market Street should be made and off-street parking created within the site should be provided if necessary.</p> <p>HS2.71 (d) Land north of Exchange Street – access to Market Street (north of Horse and Jockey) via land parcel (c) is required together with secondary access from Exchange Street and Highfield Road to Bolton Road North. The mini roundabout at the junction of Market Street and Rochdale Road, Bury Road will be assessed in the highway capacity study.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

H73

Reference **5146**

Turnbull and Stockdale

Number of supporters:

Commenting on

HS2

H73

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

We act for Turnbull and Stockdale and have been instructed to assist the company in responding to the Council's consultation on the Pre-Submission Publication Version of the Local Plan.

The Council is aware that Turnbull and Stockdale owns Edenwood Mill and its associated land, which is unused, surplus to requirements, not fit for purpose and in derelict / deteriorating condition. The full extent of our client's land – in respect of these representations – is identified with the red boundary on the plan above. The land towards the west (to the immediate rear / east of Croft Hey) comprises a quite steep wooded embankment, which our client accepts is unlikely to accommodate housing due to its relief. However, all of our client's land should be considered for release, and it would clearly be inappropriate to leave a land-locked parcel of land as Green Belt. It is likely that, as part of a future housing scheme, that steep part of the site will be offered / retained as open space / green buffering.

Planning permission was granted for residential conversion of the Mill on 15 February 2007 (ref. 2004/513). That application (now lapsed) promoted the extension, alteration and conversion of the Mill to form 25 apartments, including the formation of passing bays along Edenwood Lane.

Realistically, the former mill is now beyond restoration and would require a very considerable amount of cross subsidy to render it remotely viable (in all likelihood requiring far more land and development than is available to our client).

Our client is pleased to see part of its land allocated for housing under site ref: H73 (see Policies Map extract above). They welcome that allocation, but question and object to the omission of parts of their land. These omissions are made up of two plots of land, namely Plots 'A' and 'B' as marked on the Policies Map extract above.

Plot 'A' corresponds with the Mill's former car park. It is unclear why this has been omitted from the housing allocation, and we suggest / request its inclusion as part of the allocation. There is no

logic in excluding that small part of brownfield land, and permission has been granted in the recent past for its use as part of the residential conversion scheme.

Plot 'B' is the land to the north of the proposed allocation. This comprises a former man-made lodge and adjacent land, which is capable of accommodating a modest number of new homes. To support these representations we enclose drawing ref: PL-700-01 (Proposed Site Plan). This suggests the scope to accommodate in the region of 8 dwellings on this part of our client's land, but we anticipate that it could include more than 8 homes depending on their size / type.

Our client accordingly objects to its ongoing Green Belt designation and requests its allocation for housing as an extension to site H73.

Considering the Green Belt credentials of this particular parcel of land (ie Plot B), we question the extent to which it fulfils any of the purposes of Green Belt when it is considered in its own right, and particularly given the proposed release of site H73. If that allocation is taken forward, the remaining land will be left as little more than an 'indent' in the newly formed settlement boundary, and that will serve no meaningful or logical purpose.

Considering the five purposes of the Green Belt as set out in the Revised NPPF, we comment as below.

To check the unrestricted sprawl of large built-up areas

We contend that the release of this discrete parcel of land (Plot B) in conjunction with H73 will not result in the 'unrestricted sprawl' of a large built up area. First, Edenfield is not a 'large built up area'.

The site is an ideal site for release from the Green Belt, for reasons of its self-containment (having regard to H73 and the adjacent settlement. It is a logical 'flex' extension, which lacks overall visibility, and the stream that flanks the eastern edge removes any opportunity for 'urban sprawl' or encroachment. Nor is the land 'open', which is the principal attribute of any Green Belt.

To prevent neighbouring towns merging into one another

The release of Plot B for a small number of homes will be barely perceptible when considering both the actual and perceived gap between settlements (in this case between Edenfield and the nearest settlement, Ramsbottom).

To assist in safeguarding the countryside from encroachment

Following the release and development of H73 for housing, Plot B will not read as part of the countryside. It will be flanked by housing and hard development to the north, south and west, and as noted above will be left as nothing more than an 'indent' in the settlement boundary. Building a small number of quality homes on this site (and in the context of the release of H73) would not, therefore, constitute encroachment into the countryside.

To preserve the setting and special character of historic towns

Edenfield can reasonably be described as a historic town, but its historic core is some distance from the subject land. More modern housing flanks its eastern edge (albeit at a higher level). Again, in the context of site H73, the remaining parcel of land (Plot B) represents the logical 'rounding off' of this part of Edenfield, and cannot sensibly be argued as harming the special character of a historic town.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

It is very evident that, while the emphasis correctly remains on reusing brownfield land, there is insufficient brownfield land to accommodate the future needs of the Borough. It is for that reason why the Council has little option but to release sizeable areas of Green Belt land in order to accommodate its needs. Put simply, there is not sufficient brownfield land to accommodate future needs, and as such it cannot be suggested that the release of this small, discrete parcel of land might prejudice the use of derelict and other urban land in the Borough.

The above demonstrates that the subject site (Plot B) does not serve any true Green Belt purpose, and particularly if site S73 is developed for housing.

SHLAA 2018

While we appreciate that the purpose of the SHLAA is not to allocate sites, it is worth highlighting that Edenwood Mill is included as a potential site for housing development in the 2018 SHLAA (see extracts at Annex A).

The site scores well in the SHLAA, as it is previously developed, adjoining Edenfield's settlement boundary. Notably, the assessment confirms that any landscape impacts will be 'low' (we agree).

The assessment also explains that :

"The site is also identified as a Woodland Stepping Stone Habitat and therefore the area available for development has been reduced by 50% to allow protection of the habitat.

It is considered that the site can

become suitable in the medium term subject to the access being improved, the woodland habitat being preserved and if it is demonstrated that there are no flood risk issues to the proposed residential units."

Our client assumes that the above is the rationale behind allocating only part of our client's land and to leave the northern section as Green Belt. While our client acknowledges and is respectful of the ecological sensitivities, it is considered that these can and will be addressed via a future planning application (following appropriate surveys and with suitable mitigation), but it is not appropriate to try to second guess that assessment work and retain Plot B as Green Belt. Once site H73 is developed, the retention of Plot B as Green Belt will make little sense. Instead, it is entirely logical to release the entirety of the land, and allow technical / environmental matters to be addressed robustly via a planning application.

One other matter we wish to raise in respect of the SHLAA is the recorded 'Delivery Timeframe'. It is not clear why it is being suggested that the timeframe will be 6 – 10 years.

We feel that it is more likely that housing can and will be delivered in years 3 – 5, and we requested that that be adjusted.

CONCLUSIONS

Adjustment of the Green Belt and a corresponding change to the settlement boundary for Edenfield to integrate both Plot A and Plot B would be a positive change that supports wider regeneration and would help to reinvigorate this part of Edenfield, while accommodating quality and much needed new homes in a discrete, sustainable location.

Fundamentally, the land serves no proper Green Belt function or purpose, and this will be particularly the case when site H73 is developed for housing.

Our client therefore objects to the retention of Plots A and B within the Green Belt and considers that proposition to be unsound because the retention of the land as Green Belt is not logical in the context of H73 and is therefore not positively prepared, justified, effective, or consistent with national policy. We would be grateful if the Council / Inspector

at EIP would have due regard to the contents of this letter and allocate Plots A and B as part of housing allocation ref: H73.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
Reference	5197 Mr Marcus Hudson	Lancashire County Council
Commenting on		H73
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer
Does the Local Plan complies with the duty to co-operate? Did not answer		
<p>HS 2:73 – Proximity of site access to J1 M66 and visibility splay requirements for actual road speed (40mph speed limit) Wood Lane are a concern. The development of the site limits the possibility of a southbound on slip road onto the M66 at J1.</p>		

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
Reference	12 Mr David Burns	-
Commenting on	-	H74
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound? No
Does the Local Plan complies with the duty to co-operate? Yes		
<p>There are currently over 300 properties for sale in a 1 mile radius of the proposed Grane Village. The construction of a further 174 houses will flood the housing market and make it even more difficult for current properties to sell. The Grane Road itself is an extremely busy thoroughfare and access from any proposed development would exacerbate the traffic problems that already exist. The land on the East side of Holcombe Road is a thoroughfare for all kinds of wildlife particularly wild deer. There needs to be a roundabout at the junction of Holcombe Road with Grane Road. Trying to access Grane Road from Holcombe Road at peak times is a lottery. The delays this causes would force traffic to travel through Helmshore via Holcombe Road and Helmshore Road, an already busy route particularly at school times.</p>		

As previously stated, there are sufficient homes for sale within a one mile radius of this proposed new development therefore if does not warrant the building of new homes.

Do you wish to participate to the Examination In Public?	No	Reasons
-		

Reference	27 Mrs	Lauren	Myers	-	Number of supporters:
Commenting on	-				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>Traffic is at its worse in Rossendale as it is. There is absolutely no community spirit anymore as the 'village' is mainly commuters.Schools are at their fullest and children of generations born and bred will struggle for places.There is wildlife within this area including deer. We should not be taking more of their habitat away.We are losing the beautiful scenery the area is known for.There are plenty of houses for sale within the area that are struggling to be sold.Building more houses is forcing the house prices to increase.Because the area is known for wealth and commuters we are becoming more prone to out of area burglars even targeting homes during the day</p> <p>Occasionally it would be nice to have plans to better an area naturally rather than the let's build mentality.</p>					
Do you wish to participate to the Examination In Public?	No	Reasons	-		

Reference **38 Mrs Miriam Hopkinson-Roe** - Number of supporters:

Commenting on - H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

I am writing to object to the proposals to build in the region of 170 houses off Grane Road. I am a local resident. I object for the following reasons;Grane Road is already highly congested, particularly at rush hour. It is extremely difficult to turn into the flow of traffic and can take over 5 minutes on a bad day. There is often queuing traffic for the slip road which blocks access up Grane Road to Haslingden. As a pedestrian it is very unpleasant as the footpaths are narrow and there are a lot of lorries. It is difficult to walk along and hold the hands of even 1 child whilst maintaining an adequate distance from the road. The road is very difficult to cross and many of the elderly residents struggle to walk all the way to the one crossing available. As the road is already busy and dangerous any additional traffic using it is undesirable. The pollution generated by the traffic at times is awful. I know many local residents who have developed breathing issues and asthma. The area proposed for development is heavily used and depended on by wildlife. It is a green space which connects the south Pennine Moors with the valley of the river Ogden. It is a very important green corridor used by deer,foxes and badgers. There is a set there at present. There is woodland used by a variety of birds. The area is used by bats and owls to feed. There is a wetland area with a wide variety of birds which travel down from the reservoir. This land is always very wet and boggy and is very important for holding the water which travels down from the hills. I am concerned that if this land is covered in roads and houses there will be implications for local properties and properties in the vicinity of the river Ogden. On the website there are statements coloured in green or orange about services in the locality which are misleading. The bus service is described as frequent. The bus is every half an hour to a limited range of places. It does not operate in the evening. It describes the distance to local schools but this is misleading as the journeys are along busy or poorly lit roads and steep gradients either there or back. My own children were not able to walk to or from primary school for this reason. I know that there is immense pressure on Primary school places in the area and new children would struggle to find a school place in these local schools. I am aware that councils have had pressure from government to build housing. It is clear that a developer is interested in this land and wants to proceed as soon as possible. I am therefore concerned that the ability to meet this requirement quickly is of more importance to the planning department than the health and welfare of local people. I attended the residents meeting recently and local residents feel very strongly that 'this development is not for them, their children or the wider community. They feel it is entirely to make the developer money by selling expensive properties to commuters from outside the area. They feel this development will have the negative impacts I have outlined above. Residents also feel the character and cohesiveness of their area as well as their enjoyment of where they live will be impacted.

-
Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **91 Mr. Michael Holding Irwell Catchment NFM Group** Number of supporters:

Commenting on - - H74

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

With regards to the proposed site allocation of significant area of housing at Holden Wood (H74 on site map), the Plan should be found to be unsound as it will inevitably give rise to increased off-site surface water run-off in times of high and/or sustained rainfall; notwithstanding the use of local SUDS or other attenuation measures. This is in direct contravention of policy ENV9 "New developments should not increase on-site or off-site water run-off rates..." and will exacerbate existing high flood risk levels downstream. At a time when national and local Government and responsible agencies are trying to encourage the use of natural flood-risk management techniques to attenuate run-off from land and existing development, hard development of areas in proximity to such flashy watercourses as the Ogden/Irwell should no longer be permitted.

Consider the removal of housing allocation area H74 to make the Plan compliant with policy ENV9.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5016 Ms Angela Glynn**

Number of supporters:

Commenting on HS2 H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address?

1. Are you concerned about the amount of traffic using Grane Road? **Yes**
2. Does the speed of traffic using Grane Road worry you? **Yes**
3. Does the traffic noise concern you? **Yes**
4. Can you feel the vibration in your property when HGV's pass? **Yes**
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? **Yes**
6. Does the volume of traffic make you feel afraid when walking along Grane Road? **Yes**
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? **Yes**
8. Is your property affected by excessive dust caused by passing traffic? **Yes**
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? **No**
10. Does the volume of traffic affect your quality of life, if so please explain how? **No**
11. Do you think a roundabout at the Cemetery would aid road safety? **No**
12. Do you drive a vehicle? **Yes**
 - a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? **Yes**
 - b. How many minutes does this take (please circle **1** or than 5-10
13. Do you object to the allocation of 174 new houses with access on Grane Road? **Yes**

Further comments you may wish to make (Please continue overleaf if necessary):

To whom it may concern,

I have lived @ 8 Musbury View for 37 years. My concerns for the development on the proposed site are:-

- New house built Holden Vale disturbed foundations to my property plus the surrounding houses. Vibrations and cracks appeared in the house.
- Excess traffic increased to a already busy road, struggle to get out of the street can take up to 10 mins even down to taking risks by pulling out into the road.
- Issues with the water facilities drains and sewers are struggling now due to the age of the pipes.
- Wildlife is very active in the fields to where the houses are due to be built. I have seen over the years and now at the present time:

- Heron's
- Newts (Frogs)
- Bats
- Rabbits
- Squirrels
- Deers (Fallow)
- Blue tits
- Robins

- Insects
- Lady birds
- Bee's
- Wasps
- No room in the local schools now, doctors are full, Blackburn Hospital in the A+E department can wait up to 18 hours to be seen.

How can these extra houses improve an over-exhausted population? The Grange people have the right to protect their countryside and keep the area for the beauty it is not built and destroy the world we live in.

Do you wish to participate in the Examination In Public? **Did not answer** Reasons

Reference **5019 Mr Anthony Hodbod**

Number of supporters:

Commenting on **HS2** **H74**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

To Rossendale Borough Planning

Local Plan, H 74, land between Grane Rd and Holcombe Rd.

Housing need

Not so long ago when Central Government urged local authorities to increase house-building, assisted by easing of 'planning restraints', Rossendale Borough declared that it had enough housing for the needs of its inhabitants. Since the 1960s private housing development was encouraged in the area, and a substantial part of the population use Haslingden as a dormitory and work elsewhere. Rossendale is a low wage area. The price of new houses in the proposed development would be beyond the reach of a large proportion of the borough's inhabitants, and these houses would be bought by dormitory residents who earn better incomes elsewhere. There is no housing need.

Green Spaces

Holcombe Rd is the de facto and official [?] boundary of the built-up area .This should not mean that building should take place right up to the limit. Green spaces enhance the quality of life of urban dwellers. Building on this piece of land would do enormous damage to this semi-rural environment.

Flood risk

The piece of land [local plan H 74] 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 hillwash. Previous ground tests for proposed commercial development are reported to have found 'no bottom'. The previous owner, William Greenwood [deceased] had a small tractor [Fordson Dexter] and he said that for many months of the year he could not use it on the land because it would sink. In more recent times a local contractor with a modern tractor with large profile tyres was commissioned to flail the large growth of rushes. He had to abandon the job because tractor was sinking. The land absorbs rainfall which is released slowly into Ogden Brook. At the base of the slope is a new development, an office block. Even with major downpours, eg 26 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. This would be contrary to the stated policy of reducing flood risk- Sustainability

Appraisal Box 11.1.

Acreage of site 8,11 @4047 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 app.75% run-off.

1mm 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..

Traffic

The B 6232 used to be a little-used road carrying mainly local traffic. All this changed in 1998 when the M 65 was connected at Guide. The road has become a major arterial axis in the Northwest of England. It funnels a huge amount of traffic between the Blackburn and Preston greater area, the Fylde etc and the Greater Manchester area and beyond. What used to be a pleasant place to live has become an extremely unpleasant environment of heavy traffic, bad driver behaviour and danger. Recent speed control measures have made some difference. The proposed housing development of c 170 homes would put that same number of cars into an already traffic-blighted environment. As the

13 December 2018

houses would only be likely to be purchased by people on incomes higher than the area norm, and earned outside Rossendale, probably at least 50% of households would have two cars. The Grane Rd area cannot now cope with the present levels of traffic - to add more would be utterly irresponsible.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5036**

F and J

Knowles

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Grane Road is a notoriously dangerous, especially for those who live on it.

At peak times it is almost impossible to cross without risking your life, and it can take ten minutes easily to cross over. This volume of traffic causes a huge amount of fumes and pollution to be released into the atmosphere, affecting the health of the residents.

Has the council monitored the pollution in preparation for the building of the estate?

We object to there being an exit from the new houses directly on to Grane Road. Will the new residents from these new houses be allocated new doctors? It is very difficult to obtain an appointment with a doctor now.

If it is passed, there should be far fewer houses built on the site. We, as we live on Grane Road, suffer from all the above problems, which will not be as great for the residents of the new estate.

These new residents will not have the traffic thundering noisily past their living rooms and bedrooms. The fumes will not have as great an impact on their health. These problems will be increased for us by the addition of these new homes.

Letter received 22/09/2018

How long have you lived at the above address? 12 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? We don't know.

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or another respiratory complaint?

10. Does the volume of traffic affect your quality of life, if yes please explain how? Yes The speed and closeness of the traffic.

11. Do you think a roundabout at the Cemetery would aid road safety? Yes

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary): If the plan is passed, there should be a big reduction in the number of houses to be built.

Many HGV's still use Grane Road.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5064 Mr	Alan	Raby	Number of supporters:
Commenting on			HS2	H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?				
1. Are you concerned about the amount of traffic using Grane Road? Yes				
2. Does the speed of traffic using Grane Road worry you? Yes				
3. Does the traffic noise concern you? Yes				
4. Can you feel the vibration in your property when HGV's pass? Yes				
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No				
6. Does the volume of traffic mak tyou feel afraid when walking along Grane Road? Yes				
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes				
8. Is your property affected by excessive dust caused by passing traffic? No				
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No				
10. Does the volume of traffic affe your quality of life, if so please explain how? Yes. The noise of HGVs and vehicle transporters plularge commercial vehicles back and forth from Solomons going up and down Holcombe Road.				
11. Do you think a roundabout at the Cemeetry would aid road safety?				
12. Do you drive a vehicle? Yes				
a. If yes to the above, do yo experience any difficulty entering the flow of traffic on grane Road? Yes				
b. How many minutes does this take (pleas circle) 5-10				
13. Do you object to the allocation of 174 new houses with access on Grane Road? No				
Do you object to the allocation of 174 new houses with access on Holcombe Rd? Yes				
Further comments you may wish to make (Please continue overleaf if necessary):				
It seems to me if this plan goes ahead with the amount of houses suggested where is the infrastrcuture to accommodate them such as schools, doctors etc. Also as the land is rather marhsy the chance of top water creating flooding at the bottom of Holcombe Rd and the brook. The traffic problem is also now getting critical on Grane Rd. An extra 250-300 more cars pouring onto it is unimagivable. It seems to me it is heading to gridlock (then what will you do?) There are no alternatives. Don't be bullied by the Government!				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5105**

Andrew

Peacock

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 1 year

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? No

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes Constant noise disruption; difficulty reversing from drive; reckless and ignorant drivers

11. Do you think a roundabout at the Cemetery would aid road safety? Yes

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary): Moving to Grane Road in January and moving away again next month largely due to the traffic issue.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5106 Mr & Ms James & Ellie**

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 12 months

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road? No

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes

11. Do you think a roundabout at the Cemetery would aid road safety? Yes

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Both our cars have been damaged more than once, we as a family have to park across the road and have to walk to our home with children as the current traffic flow doesn't allow us to park outside our house.

Do you wish to participate to the Examination In Public? **Did not answer**

Did not answer

Reasons

Reference **5108 Mr Andrew Romery**

Number of supporters:

Commenting on **HS2** **H74**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 6 yrs

1. Are you concerned about the amount of traffic using Grane Road? Yes
2. Does the speed of traffic using Grane Road worry you? No
3. Does the traffic noise concern you? Yes
4. Can you feel the vibration in your property when HGV's pass? Yes
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No
6. Does the volume of traffic make you feel afraid when walking along Grane Road? No
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes
8. Is your property affected by excessive dust caused by passing traffic? Yes
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No
10. Does the volume of traffic affect your quality of life, if so please explain how? No
11. Do you think a roundabout at the Cemetery would aid road safety? Yes
12. Do you drive a vehicle? Yes
 - a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes
 - b. How many minutes does this take (please circle) 1
13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary): This will have a massive impact on the local community. Not only taking the natural beauty away from residnets, but the increase in traffic on the already heavily congested Grane Rd will impact heavily on all those who travel using the road. This in turn will increase the pollution in the air for all people living in close proximity.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5109	B	Marks	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address? 20 yrs				
1. Are you concerned about the amount of traffic using Grane Rod? Yes				
2. Does the speed of traffic using Grane Road worry you? Yes				
3. Does the traffic noise concern you? Yes				
4. Can you feel the vibration in your property when HGV's pass? Yes				
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No				
6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes				
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes				
8. Is your property affected by excessive dust caused by passing traffic? Yes				
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complain? Yes				
10. Does the volume of traffic affect your quality of life, if so please explain how? Yes				
11. Do you think a roundabout at the Cemetery would aid road safety? Yes				
12. Do you drive a vehicle? Yes				
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes				
b. How many minutes does this take (please circle) 1-5				
13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes				
Further comments you may wish to make (Please continue overleaf if necessary): 1) Grane Rd is the Lancs cycleway. I'm an experience cyclist but now no longer dare cycle on it due to levels of traffic using rat run to M65. 2) Large lorries still use it. 3) I'm very concerned about pollution levels from the road. 4) I'm very concerned about light pollution from Solomons.				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5112 Ms Bethany Dempsey-Mowadl**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 13 years

1. Are you concerned about the amount of traffic using Grane Rod? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complain? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. It is difficult to leave Holden Place by car frequently due to excess traffic.

11. Do you think a roundabout at the Cemetery would aid road safety? Yes

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle 5-10 sometimes more)

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary): A further 174 house will increase the amount of vehicles excessively and only exacerbate existing issues.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5121	Brian Williams	Kathleen Williams	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	18 years			
1. Are you concerned about the amount of traffic using Grane Rod?	Yes			
2. Does the speed of traffic using Grane Road worry yo? + volume	Yes			
3. Does the traffic noise concern you?	Yes			
4. Can you feel the vibration in your property when HGV's pass?	Yes			
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	No			
6. Does the volume of traffic make you feel afraid when walking along Grane Road?	Yes			
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes			
8. Is your property affected by excessive dust caused by passing traffi	No			
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complait?	Yes			
10. Does the volume of traffic affect your quality of life, if so please explaiho?	Yes Noise + Pollution (Loss of sleep + coughing). Loss of green space			
11. Do you think a roundabout at the Cemetery would aid road safety?	Yes			
12. Do you drive a vehicle?	Yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	Yes			
b. How many minutes does this take (please cire)	1-5			
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes			
Further comments you may wish to make (Please continue overleaf if necessary):	Worry of flooding. How many affordable homes to be built?? (for Rossendale Population). Hospital-Schools/Drs (access to). Wildlife - Loss of. Wi-fi problems.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5124**

C

Robinson

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 5 yrs

1. Are you concerned about the amount of traffic using Grane Rod? Yes
2. Does the speed of traffic using Grane Road worry yo? + volume Yes
3. Does the traffic noise concern you? Yes
4. Can you feel the vibration in your property when HGV's pass No
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No
6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes
8. Is your property affected by excessive dust caused by passing traffic? Yes
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No
10. Does the volume of traffic affect your quality of life, if so please explain how? No
11. Do you think a roundabout at the Cemetery would aid road safety? Yes
12. Do you drive a vehicle? Yes
 - a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes
 - b. How many minutes does this take (please circle) 1-5 or 5-10
13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary): I have trouble leaving Holden Place to get on Grane Road on a daily basis due to traffic. I feel more housing e.g. 174 homes will cause total chaos on Grane Road. 174 homes will have an average of 2.28 vehicles per household, 396 more vehicles trying to gain access to Grane Road, causing long delays and more dust.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5126 Ms	Claire	Winfield		Number of supporters:
Commenting on				H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
How long have you lived at the above address?					
1. <input checked="" type="checkbox"/> Are you concerned about the amount of traffic using Grane Rod? Yes					
2. <input checked="" type="checkbox"/> Does the speed of traffic using Grane Road worry you? Yes					
3. <input checked="" type="checkbox"/> Does the traffic noise concern you? Yes					
4. <input checked="" type="checkbox"/> Can you feel the vibration in your property when HGV's pass? Yes					
5. <input checked="" type="checkbox"/> Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes					
6. <input checked="" type="checkbox"/> Does the volume of traffic make you feel afraid when walking along Grane Road? Yes					
7. <input checked="" type="checkbox"/> Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes					
8. <input checked="" type="checkbox"/> Is your property affected by excessive dust caused by passing traffic? Yes					
9. <input checked="" type="checkbox"/> Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No					
10. <input checked="" type="checkbox"/> Does the volume of traffic affect your quality of life, if so please explain how? Yes 15 minutes to cross road to my house not going to be solved with a roundabout					
11. <input checked="" type="checkbox"/> Do you think a roundabout at the Cemetery would aid road safety? Yes					
12. <input checked="" type="checkbox"/> Do you drive a vehicle? Yes					
a. <input checked="" type="checkbox"/> If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes					
b. <input checked="" type="checkbox"/> How many minutes does this take (please circle) 1-5 or 5-10 or More 15 sometimes					
13. <input checked="" type="checkbox"/> Do you object to the allocation of 174 new houses with access on Grane Road? Yes					
Further comments you may wish to make (Please continue overleaf if necessary): Far too much traffic as it stands. People are abusive on the road in their cars bipping, shouting etc. Wildlife is going to suffer. Flooding is a possibility off the home at side of my house.					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference **5127 Mr Dave Wise**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

To whom it may concern.

I am writing this regarding the new proposed local plan and specifically the proposed development of Grane Village HS 74 for 174 homes. My main concern is the number of dwellings and the significant increase it would have on Grane and Holcombe Roads on average 174 homes would have two or more cars per home doing two journeys per day plus delivery and service vehicles would amount to between 750 to 900 car journeys per day.

The local plan was to provide council allocations for housing and industry but it should also provide the existing population with a safe and pleasant area to live.

Regarding Grane Road I think this road has now reached saturation point regarding the amount of traffic it can almost take up to fifteen minutes to get out of Warburton Street and trying to cross is very unsafe as there is very little break in traffic. The average speed cameras have reduced speed on this road especially from the Holden Arms to the junction with the bypass but this has resulted in the traffic now bunching creating an endless stream of traffic. If this development was to proceed I think the number of homes need to be reduced and consideration for existing residents regarding traffic.

My suggestion for this would be traffic lights at the Holden Arms and to convert the pedestrian crossing at the bottom of the hill into traffic lights incorporating Grane Road and St Crispian Way the crossing at the moment is not utilised fully due to its location where there are no housing and half way between bus stops. Crossing of the road could also be made safer by putting an island near the bus stop adjacent to The Courtyard industrial Estate.

When the plans for The Courtyard were submitted this included resident off road parking but was never done and now the main road and side streets are full so I think this should be thought of as parking on the pavements is common and pedestrians are having to walk in the busy road.

This local plan shouldn't just be about developments and developers but about the local residents.

Hoping this letter of concern will get a fair readings and the suggestions looked at.

Regards

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5128 Mr	David	Pilling	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	46 years			
1. Are you concerned about the amount of traffic using Grane Rod?	Yes			
2. Does the speed of traffic using Grane Road worry you?	Yes			
3. Does the traffic noise concern you?	Yes			
4. Can you feel the vibration in your property when HGV's pass?	Yes			
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	Yes			
6. Does the volume of traffic make you feel afraid when walking along Grane Road?	Yes			
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes			
8. Is your property affected by excessive dust caused by passing traffic?	Yes			
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	Yes			
10. Does the volume of traffic affect your quality of life, if so please explain how?	Yes			
11. Do you think a roundabout at the Cemetery would aid road safety?	Yes			
12. Do you drive a vehicle?	Yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	Yes			
b. How many minutes does this take (please circle 5-10)				
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes			
Further comments you may wish to make (Please continue overleaf if necessary):				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5129 Ms Diana Barnes**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 29 years

1. Are you concerned about the amount of traffic using Grane Rod? Yes

2. Does the speed of traffic using Grane Road worry yuo Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pas? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passin traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any oth respiratory complaint No

10. Does the volume of traffic affect your quality of life, if splease explain how? Yes It's continous!!!

11. Do you think a roundabout at the Cemetery would aid road safety No

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please ccle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary): The noise from the traffic as forced me to put tripple glazing in the front windows up and down stairs at than extra cost which I couldn't really afford. I would invite anyone to spend a day sitting in my front room to see what we have to put with. The other night they were still working over the road with two big cranes at 10.30 in the evening. The thought of more cars coming out on to Grane Road is a JOKE!!! Think you need to find somewhere else!!! to build these houses!!!

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5130 Ms	Diane	Keys	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?				
1. Are you concerned about the amount of traffic using Grane Rod? Yes				
2. Does the speed of traffic using Grane Road worry you? Yes				
3. Does the traffic noise concern you? No				
4. Can you feel the vibration in your property when HGV's pass? No				
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No				
6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes				
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes				
8. Is your property affected by excessive dust caused by passing traffic? No				
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No				
10. Does the volume of traffic affect your quality of life, if so please explain how? Trying to enter Grane Rd in a morning adds another 10 minutes				
11. Do you think a roundabout at the Cemetery would aid road safety? No				
12. Do you drive a vehicle? Yes				
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes				
b. How many minutes does this take (please circle) 5-10				
13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes				
Further comments you may wish to make (Please continue overleaf if necessary): Wildlife in fields (deer/owls) their habitat will be disturbed.				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5131 Mr Eric Mizon**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 64 ys

1. Are you concerned about the amount of traffic using Grane Rod? Yes
 2. Does the speed of traffic using Grane Road wor you? Yes
 3. Does the traffic noise concern yo? Yes
 4. Can you feel the vibration in your property when HGV's pss? Yes
 5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using GranRoad? Yes
 6. Does the volume of traffic make you feel afraid when walking along Grane Rod? Yes
 7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes
 8. Is your property affected by excessive dust caused by passin traffi? Yes
 9. Do you or a member of your household suffer from Bronchitis, Asthma or any oth respiratory complain tNo
 10. Does the volume of traffic affect your quality of life, if splease explain ho As above in nos 2, 3, 5, 6, 7 and 8
 11. Do you think a roundabout at the Cemetery would aid road safet ? Yes
 12. Do you drive a vehicle? Yes
 - a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes
 - b. How many minutes does this take (pleas circle) 5-10
 13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes
- Further comments you may wish to make (Please continue overleaf if necessary):

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5132	Fran	Johnson	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	48 years			
1. Are you concerned about the amount of traffic using Grane Rod?	Yes			
2. Does the speed of traffic using Grane Road wor you?	Yes			
3. Does the traffic noise concern yo?	Yes			
4. Can you feel the vibration in your property when HGV's pss?	Yes			
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using GranRoad?	Yes			
6. Does the volume of traffic make you feel afraid when walking along Grane Rod?	Yes			
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes			
8. Is your property affected by excessive dust caused by passin traffi?	Yes			
9. Do you or a member of your household suffer from Bronchitis, Asthma or any oth respiratory complain	Yes			
10. Does the volume of traffic affect your quality of life, if splease explaihow?	Can't have windows open because of noise + dust			
11. Do you think a roundabout at the Cemetery would aid road safety ?				
12. Do you drive a vehicle	No			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Roa				
b. How many minutes does this take (pleas circle)				
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes			
Further comments you may wish to make (Please continue overleaf if necessary):	The volume of traffic is horrendous, speed cameras have been installed but do not appear to have made any difference, vehicles are still speeding up + down the road, when sat in the house or garden all you can hear is traffic noise.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5133**

Gemma

Epstein

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 15 years

1. Are you concerned about the amount of traffic using Grane Rod? Yes

2. Does the speed of traffic using Grane Road wor you? Yes

3. Does the traffic noise concern yo? Yes

4. Can you feel the vibration in your property when HGV's pss? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using GranRoadNo

6. Does the volume of traffic make you feel afraid when walking along Grane Rod? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passin traffi? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any oth respiratory complain Yes

10. Does the volume of traffic affect your quality of life, if splease explaihow Yes We have trouble getting out onto the road in the car.

11. Do you think a roundabout at the Cemetery would aid road safety ? No

12. Do you drive a vehicl? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Gra Road? yes

b. How many minutes does this take (pleas circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary): Grane Road is already busy and dangerous with the amount of traffic and we see a lot of deer on the field. They would have less places to go.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5134	Graham Holland	Kirsty Holland	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	19 years			
1. Are you concerned about the amount of traffic using Grane Rod?	Yes			
2. Does the speed of traffic using Grane Road wor you?	Yes			
3. Does the traffic noise concern yo?	Yes			
4. Can you feel the vibration in your property when HGV'sass?	No			
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grae nRoad?	No			
6. Does the volume of traffic make you feel afraid when walking along Grane Rod?	Yes			
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes			
8. Is your property affected by excessive dust caused by passin trafcs?	No			
9. Do you or a member of your household suffer from Bronchitis, Asthma or any oth respiratory complain	Yes			
10. Does the volume of traffic affect your quality of life, if splease explaihowYeNoise. Time to enter Grane Road				
11. Do you think a roundabout at the Cemetery would aid road safety ?	Yes			
12. Do you drive a vehicl?	Yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Gra Road?	yes			
b. How many minutes does this take (pleas circle)	5-10			
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes			
Further comments you may wish to make (Please continue overleaf if necessary):	Building on green land. Increase of around 300 cars. Local schools can't cope now, so how could they cope with extra 200-300 children. Been involved in two accidents already on Grane Road, both when turning into or out of Warbuton St. We need to go slow to enter Warbuton St and it's scary as cars drive to close. Not enough infrastructure in Haslingden / Helmshore to cope with 174 houses.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5135**

Michael

Murray

Grane Residents Association

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Grane Residents' Association

Response to Rossendale 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 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 their locality should not be covered with industrial units and mobilised themselves into "Save Grane". The long fight ahead included 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."

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 Pen nine Moors, the largest new site of special scientific interest (5551) 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 0.0 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 Helmsshore 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 I2, 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 developers 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.

GRAss 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 ICB 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 Rosendale 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.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5136	Hayley	Muskett	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	33 years			
1. Are you concerned about the amount of traffic using Grane Rod?	Yes			
2. Does the speed of traffic using Grane Road wor you?	Yes			
3. Does the traffic noise concern yo?	Yes			
4. Can you feel the vibration in your property when HGV's pass?	Yes			
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	Yes			
6. Does the volume of traffic make you feel afraid when walking along Grane Rod?	Yes			
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes			
8. Is your property affected by excessive dust caused by passing traffic?	No			
9. Do you or a member of your household suffer from Bronchitis, Asthma or another respiratory complaint?	No			
10. Does the volume of traffic affect your quality of life, if yes please explain how?	Yes I am in a wheelchair and when I am out on Grane rd I feel very vulnerable, even being pushed.			
11. Do you think a roundabout at the Cemetery would aid road safety?	No			
12. Do you drive a vehicle?	No			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?				
b. How many minutes does this take (please circle)				
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes			
Further comments you may wish to make (Please continue overleaf if necessary):	As I spend most of my time in the garden during the nice weather I do not want to be overlooked by the surrounding apartments and houses and the planning of the exit road from the estate coming up at the side of my drive. The noise, vehicles will be mayhem.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5173**

Taylor Wimpey

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS2: Housing Site Allocations

2.40 Taylor Wimpey wholly support the allocation of the Grane Village site for residential development (H74), and we discuss this site, and its delivery assumptions, in more detail in Section 3 of these representations.

2.41 We would also reiterate our comments on policy SD2 in that we fully support the Council's acceptance that Green Belt release is necessary, and that the policy wording and supporting evidence base clearly demonstrates that exceptional circumstances exist in Rossendale which justify this.

2.42 Looking at the allocations themselves, there are 78 in total, with an expected capacity of 2,853 dwellings at an average density of 53 dph; which falls short of meeting the proposed housing requirement of 3,180 dwellings in full.

2.43 The supporting text confirms that the table includes extant planning permissions which have not been started or are still being built out and are not expected to be completed this financial year. Given this, it is not entirely clear how the Council intend to deliver the remaining 327 dwellings to fulfil the suggested housing requirement figure of 3,180 over the Plan Period.

2.44 Whilst it can be assumed that the remaining housing requirement will be delivered in the form of windfall development, Policy HS2, the supporting evidence base and the housing trajectory in the Regulation 19 plan do not make this clear. We therefore ask for further clarity from the Council as to how the overall housing requirement figure of 3,180 will be met in Rossendale. Furthermore, we express further concern about the assumptions made regarding housing supply and delivery, which we consider to be overly optimistic and do not provide enough flexibility/certainty that emerging development requirements will be met. We explore this in the following section (discussion relating to the housing topic paper).

2.45 We have already outlined why there are compelling reasons as to why Rossendale should adopt a Housing Requirement which goes above and beyond the figure of 212 dwellings per annum, as suggested by the Government's standardised housing calculation. This alone indicates that the Council will need to allocate additional sites to meet its basic requirements.

2.46 Furthermore, the NPPF is categoric that housing requirement is a minimum figure which Local Plans should seek to surpass, and this interpretation has been endorsed in numerous Local Plan examinations. Exceeding the basic requirement also generates a buffer in the supply and gives flexibility within the plan to take account of under-delivery and to provide additional choice in the market.

2.47 A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Such an approach is recommended within the LPEG report to Government (dated March 2016), with recommendation 40 (at Appendix A) noting that Local Plans should:

"focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF. Reserve Sites represent land that can be brought forward to respond to changes in circumstances."

2.48 As such the Council should consider allocating additional sites over and above its housing requirement. Based on the Council's current requirement a 20% uplift would require allocations for up to 3,816 dwellings and based on the claimed supply of 2,853 would require land for approximately 963 additional dwellings to be identified.

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2.49 A higher requirement of 269 dpa, which is suggested as a minimum in our economic analysis, would give an overall requirement of 4,035 (rising to 4,842 with a 20% buffer) and could therefore require land for a further 1,989 units to be identified.

2.50 Finally, it must be noted that an average density of 53 on the proposed allocations appears high, and may not be achievable, meaning that further land would need to be identified.

5 Year Supply - Housing Topic Paper

2.51 Moving on to the Council's August 2018 Housing Topic Paper, paragraph 3.5.9 states that when utilising the government's standardised housing requirement figure and adding a 20% buffer to account for historic under-delivery, the minimum number of dwellings to be provided within the first five years of the plan is 1,272 dwellings. Paragraph 3.5.10 later confirms that 1,643 dwellings are likely to be delivered between years one to five of the plan period (2019-2024), proceeding to suggest that this indicates that the Local Plan is allocating enough sites to provide a healthy land supply in the first five years.

2.52 We have several concerns with this approach. Firstly, it has already been demonstrated that there is strong evidence to support the Council exceeding the minimum standard methodology requirement of 212 dwellings per annum, to deliver a housing target and Local Plan which is ambitious as well as realistic, taking into account previous economic growth figures which are not accounted for at all within the standardised methodology approach. We have already expressed our concerns regarding the government's standardised approach, which only looks at demographic trends alone, and have recommended a minimum figure of 269 dpa to meet economic growth aspirations as set out in the SHMA and fully supported by the revised NPPF and NPPG.

2.53 Secondly, these figures do not take account of any historic under delivery, even though tables 1 and 6 clearly demonstrate substantial under delivery in the previous 3 years (totalling 278 or 37.5% against the Core Strategy target of 247, and 357 or 43.5% against the Core Strategy trajectory). When this is taken across the full Core Strategy period from 2011 the total shortfall is 523 units (based on this topic paper and the May 2017 5 year supply statement), and this must be taken account of in the 5 year supply calculation.

2.54 Thirdly, we have concerns with the level of supply claimed within the trajectory (1,643). The main issue is that this is almost entirely made up of allocations, however the glossary of the revised NPPF clearly confirms that Local Plan Allocations can only be included where there is clear evidence of delivery. Such evidence has not been provided and as such it is arguable whether these sites can be included in full. A common approach is to apply a discount to the claimed supply to allow for some under delivery which is inevitable, particularly on sites that don't have planning permission (as many of these allocations don't), and a 10% lapse rate is generally advocated by S78 Inspectors and would be appropriate here given Rossendale's physical constraints and historic under delivery.

2.55 Based on the above we have calculated Rossendale's Housing supply as below, which generates a figure of 3.89 years based on the 212 dpa target, and 3.29 years based on our recommended minimum target of 269 dpa; suggesting that additional sites need to be identified or brought forward to deliver within the first 5 years of the plan period.

Figure 2.1 – Rossendale's 5 Year Housing Land Supply

2.56 We would also highlight that the Housing Topic Paper does not include a full 5 year supply update and as such the latest formal evidence on this is the Council's 5-Year Housing Land Supply Report (2017-2022) dated May 2017, which claimed between 2.4 and 2.6 year supply, whilst our analysis suggested this was between 2.11 and 2.33 years.

2.57 In short there are acute supply issues in the area that should be addressed at the earliest opportunity.

3. GRANE VILLAGE, HASLINGDEN (ALLOCATION H74)

3.1 Taylor Wimpey have sole control over a 6-hectare site at Grane Road, Haslingden known as 'Grane Village' and have been working alongside the Council to promote the allocation of this site for residential development since 2012.

3.2 This site was originally put forward for development as part of Council's 'Lives & Landscapes- Green Belt & Urban Boundary Review' consultation in December 2012, as it was recognised as being at the edge of the urban area and in poor condition; therefore making a limited contribution to the countryside. Taylor Wimpey fully supported this boundary change and have since provided further clarification to the Council on the site's suitability and deliverability through a Development Statement, submitted in January 2014 and this is attached at Appendix 1.

3.3 The site (SHLAA Ref: 16304) is now proposed as a housing allocation (Site H74) within Policy HS2 of the Draft Plan, although we note this also includes another small parcel of

land in separate ownership (SHLAA Ref: 16402).

3.4 The attached Development Statement and evidence submitted to date have demonstrated that this is a sustainable and deliverable site in accordance with the NPPF, which is capable of delivering up to 160 units, commencing within the next 5 years.

3.5 We therefore welcome the Council updating the delivery table in the Regulation 19 consultation, stating that the Grane Village allocation has capacity to deliver 174 no. dwellings. However, we would ask that the anticipated delivery timeframe for this site be changed from years 1-10 to years 1-5. This is because the attached Development Statement confirms that the site is capable of delivering units within the next 5 years, and additionally Local Plans should not be holding deliverable sites back, particularly where there is an existing 5-year supply shortfall as there is in Rossendale.

3.6 Taylor Wimpey are very committed to bringing the site forward at the earliest opportunity and are in the process of commissioning various technical reports to support an imminent planning application submission. Indeed, a pre-application meeting was held with the Council on 14th September 2018, and it is the intention to submit a planning application in early 2019, and aim for determination by mid-2019.

Evidence Base – Grane Village

3.7 We now provide comments on the evidence base documents which consider the Grane Village site:

Landscape Assessment

3.8 We agree with many of the findings of this report, but have concerns with some of the conclusions in relation to the Grane Village Site. As such, Randall Thorp have provided a comprehensive rebuttal statement which provides commentary on the findings of the Landscape Report, which can be found in Appendix 2. The Randall Thorp note should be read in conjunction with these representations and can be summarised as follows:

- The Council's Landscape Assessment recommended that planned gaps in the layout of the site should be used to retain views to Tor Hill. It is not considered that the existing view to Tor Hill from the identified viewpoint on Grane Road is of exceptional quality due to the visual influence of the large scale industrial buildings which dominate the foreground to the left of the view. As such, it is not considered that the quality of this existing view is high enough to require the entire view line to be kept free from development.
- Appropriately designed development can be delivered on the Grane Village site without resulting in significantly adverse effects upon landscape character, landscape features, or visual receptors.

3.9 This demonstrates that development of the Grane Village site will not generate any adverse landscape impacts, reinforcing its allocation in the Draft Plan.

Strategic Housing Land Availability Assessment- Stages 1 and 2 (August 2018)

3.10 The site was assessed in the SHLAA under site reference 16304. Whilst we agree that the site is suitable and achievable, we would question why it has been not been considered deliverable in the short term, and have a few comments on some of the findings. The Council already consider this site a suitable housing allocation, however, in our view, the site actually performs even better in certain categories of the SHLAA as explained below:

- Ecological value- The site is scored as red in this category, with the commentary explaining how a small strip of land in the site is located within woodland and grassland Stepping Stone. The Development Statement for this site considered all ecological matters, and concluded that there are no ecological or arboricultural constraints preventing the development of this site and appropriate mitigation will be provided where necessary. Additionally, the area of high ecological value to the south-east of the site has been excluded from development, and will therefore be protected by proposals. This is not considered to be an issue on site, therefore the site performs better than a red scoring in this category when taking the masterplan into consideration.
- Landscape value- In the Council's 2015 Landscape Assessment, it is concluded that the Grane Village site is 'suitable for development with mitigation'. As the 2015 Landscape Assessment conclusions were specific to the site, it is therefore unclear why the SHLAA has stated that this site has a high landscape impact. The Randall Thorp report attached at Appendix 2 further confirms that the site is suitable from a landscape perspective. It is therefore considered that the landscape scoring of the site is incorrect in the SHLAA, and should certainly not be categorised as red.

3.11 We also note that the scoring methodology and scope of the SHLAA does not allow for detailed considerations such as masterplanning and proposed design/mitigation. The

Illustrative Masterplan for Grane Village (see Appendix 1) illustrates how the existing public right of way does not pose a constraint on site, on the contrary it can be well-integrated into development proposals.

3.12 Therefore, the site will in reality score higher than amber in the recreational value category, when considering the design of development proposals. A similar comment can be made with regards to the flood risk category-the development proposals shown on the illustrative masterplan excludes the area at medium/high risk of surface water flooding. For clarity, the proposed development is located entirely within Flood Zone 1, representing the lowest level of flood risk.

Sustainability Appraisal and Strategic Environmental Assessment of the Rossendale Local Plan (August 2018)

3.13 The Council have commissioned a Sustainability Appraisal and Strategic Environmental Assessment (August 2018) as a key document of the evidence base. We do not have any detailed comments on this document at this stage, other than we would reiterate the point that key aspects such as landscape and cultural heritage will be carefully considered at the detailed design stage. As a high level point we therefore highlight that the site will score much higher in reality, at the detailed design stage, than some of the red scores suggested in the Sustainability Appraisal report.

Heritage Impact Assessment of Housing and Employment Sites (August 2018)

3.14 The Grane Village, Haslingden site is assessed in this report under Local Plan Reference H74/SHLAA 16304. We have no detailed comments on the contents of the assessment of the site and support the conclusion that the development of the site will be acceptable subject to mitigation. The only matter we take note of is the proposed Conservation Areas in Haslingden and Helmshore. Whilst future development proposals will carefully consider the proposed Conservation Areas, looking at maps of the proposed areas we note that the site is not located in close proximity to these. As such, we do not anticipate any issues arising from the development of the Grane Village site in terms of heritage impact.

Conclusions on Grane Village

3.15 Overall, Taylor Wimpey are wholly supportive of the Grane Village, Haslingden allocation (H74), subject to the above comments on the evidence base relating to the site.

4. CONCLUSION

4.1 Overall, Taylor Wimpey fully support the allocation of the Grane Village site (H74), subject to the comments and suggestions made above, which note that:

- The overall housing requirement should be increased to take account of economic aspirations and to provide flexibility to accommodate any unmet need generated by the adjacent authorities in Greater Manchester. Namely, there is strong evidence to justify the Council setting a housing target of at least 269 dpa, which goes above and beyond the government's standardised housing methodology calculation, which we reiterate is a minimum starting point and should not be considered as a cap;
- The Council should consider allocating additional sites, both as long term reserve sites to provide some headroom in their overall supply, and smaller short term sites to boost 5 year supply, given the current shortfalls.

4.2 This representation has shown that the site is deliverable and developable in line with the NPPF, and has also demonstrated its importance for housing delivery in Rossendale, representing over 5% of the total allocated dwelling numbers and will make a significant contribution to 5 year supply.

4.3 Importantly, Taylor Wimpey have been promoting Grane Village for almost 6 years and will continue to work alongside the Council, with the submission of a planning application expected in early 2019, to demonstrate that it can begin delivering in the next 5 years.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5175 Ms Jeannette Jackson**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 3 months

1. Are you concerned about the amount of traffic using Grane Road? Yes
 2. Does the speed of traffic using Grane Road worry you? Yes
 3. Does the traffic noise concern you? Yes
 4. Can you feel the vibration in your property when HGV's pass? Yes
 5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes
 6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes
 7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes
 8. Is your property affected by excessive dust caused by passing traffic? Yes
 9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No
 10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Wakes us up every morning rush hour
 11. Do you think a roundabout at the Cemetery would aid road safety? No
 12. Do you drive a vehicle? Yes
 - a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes
 - b. How many minutes does this take (please circle 1-5
 13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes
- Further comments you may wish to make (Please continue overleaf if necessary): Would add to the volume of traffic.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5177 Mr	John	Hindley	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	24 yrs			
Are you concerned about the amount of traffic using Grane Road?	Yes			
Does the speed of traffic using Grane Road worry you?	yes			
Does the traffic noise concern you?	yes			
Can you feel the vibration in your property when HGV's pass?	yes			
Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	yes			
Does the volume of traffic make you feel afraid when walking along Grane Road?	no			
Do you experience difficulty crossing Grane Road due to the amount of traffic?	yes			
Is your property affected by excessive dust caused by passing traffic?	yes			
Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	yes			
Does the volume of traffic affect your quality of life, if so please explain how?	Yes. Traffic noisy, always worried about car damage + parking			
Do you think a roundabout at the Cemetery would aid road safety?	Traffic lights Yes			
Do you drive a vehicle?	Yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	Yes			
b. How many minutes does this take (please circle) 1-5				
Do you object to the allocation of 174 new houses with access on Grane Road?	yes			
Further comments you may wish to make (Please continue overleaf if necessary):	We need affordable housing. Problems of traffic but also strains on infrastructure.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5178 Mr John Towriess**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 1 year

Are you concerned about the amount of traffic using Grane Road? Yes

Does the speed of traffic using Grane Road worry you? No

Does the traffic noise concern you? yes

Can you feel the vibration in your property when HGV's pass? yes

Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? no

Does the volume of traffic make you feel afraid when walking along Grane Road? no

Do you experience difficulty crossing Grane Road due to the amount of traffic? yes

Is your property affected by excessive dust caused by passing traffic? no

Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? no

Does the volume of traffic affect your quality of life, if so please explain how? no

Do you think a roundabout at the Cemetery would aid road safety? yes

Do you drive a vehicle? yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? yes

b. How many minutes does this take (please circle) 1-

Do you object to the allocation of 174 new houses with access on Grane Road? yes

Further comments you may wish to make (Please continue overleaf if necessary): Traffic is already terrible, more houses, means more cars which means more traffic.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5179 Mr	Jonathan	Smith	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	18 months			
Are you concerned about the amount of traffic using Grane Road?	Yes			
Does the speed of traffic using Grane Road worry you?	yes			
Does the traffic noise concern you?	no			
Can you feel the vibration in your property when HGV's pass?	yes			
Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	no			
Does the volume of traffic make you feel afraid when walking along Grane Road?	no			
Do you experience difficulty crossing Grane Road due to the amount of traffic?	yes			
Is your property affected by excessive dust caused by passing traffic?	no			
Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	yes			
Does the volume of traffic affect your quality of life, if so please explain how?	no			
Do you think a roundabout at the Cemetery would aid road safety?	yes			
Do you drive a vehicle?	yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	yes			
b. How many minutes does this take (please circle) 1-5				
Do you object to the allocation of 174 new houses with access on Grane Road?	yes			
Further comments you may wish to make (Please continue overleaf if necessary):				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5180**

June

Mill

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? Since April 201 but lived in the area 45 yrs

Are you concerned about the amount of traffic using Grane Road? Yes

Does the speed of traffic using Grane Road worry you? yes

Does the traffic noise concern you? no

Can you feel the vibration in your property when HGV's pass? no

Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? no

Does the volume of traffic make you feel afraid when walking along Grane Road? yes

Do you experience difficulty crossing Grane Road due to the amount of traffic? yes

Is your property affected by excessive dust caused by passing traffic? no

Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? no

Does the volume of traffic affect your quality of life, if so please explain how? Yes. Every day I have to use Grane Road by the Holden Arms and it's a nightmare

Do you think a roundabout at the Cemetery would aid road safety? No!!! It needs traffic lights it's a danger zone

Do you drive a vehicle? yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? yes

b. How many minutes does this take (please circle) 5-10

Do you object to the allocation of 174 new houses with access on Grane Road? yes

Further comments you may wish to make (Please continue overleaf if necessary): It's a bad idea, there is just no leaway for more traffic, the schools are overcrowded, the small amount of green space on Camms is going. We have Helmsmore village we don't need a "new Grane village" just do everyone a favour, have allotments instead. A beautiful area full of horses again. More traffic, noise and pollution NO!!!

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5181 Mrs	K	Pollard	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	22 yrs			
Are you concerned about the amount of traffic using Grane Road?	Yes			
Does the speed of traffic using Grane Road worry you?	yes			
Does the traffic noise concern you?	no			
Can you feel the vibration in your property when HGV's pass?	sometimes			
Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?				
Does the volume of traffic make you feel afraid when walking along Grane Road?	yes			
Do you experience difficulty crossing Grane Road due to the amount of traffic?	yes			
Is your property affected by excessive dust caused by passing traffic?	no			
Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	yes			
Does the volume of traffic affect your quality of life, if so please explain how?	Yes. Difficulty getting from one side of road to other to catch bus or post letters.			
Do you think a roundabout at the Cemetery would aid road safety?	No			
Do you drive a vehicle?	yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	yes			
b. How many minutes does this take (please circle) 5-10 sometimes more				
Do you object to the allocation of 174 new houses with access on Grane Road?	yes			
Further comments you may wish to make (Please continue overleaf if necessary):	The increase of more houses would increase the amount of cars on grane Road. If you (go down) from a bus between 4pm and 6pm you could spend 20 minutes trying to find a gap in the traffic so you can cross from one side to the other. As it is people who live on grane Road have to park their car outside the fronts of their houses because there isn't anywhere else. Which means pedestrians have to walk out into the road to stop the Blackburn/Bury bus. So more traffic would not help.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5182**

Kath and Graham

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 26 yrs

Are you concerned about the amount of traffic using Grane Road? Yes

Does the speed of traffic using Grane Road worry you? yes

Does the traffic noise concern you? yes

Can you feel the vibration in your property when HGV's pass? yes

Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? yes

Does the volume of traffic make you feel afraid when walking along Grane Road? yes

Do you experience difficulty crossing Grane Road due to the amount of traffic? yes

Is your property affected by excessive dust caused by passing traffic? yes

Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? no

Does the volume of traffic affect your quality of life, if so please explain how? Yes. It can take up to 20 minutes to 'pull out' on Grane Rd between 7.30-8am. It can take up to 20 minutes to turn my car round on Grane Rd.

Do you think a roundabout at the Cemetery would aid road safety? No

Do you drive a vehicle? yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? yes

b. How many minutes does this take (please circle) more see above

Do you object to the allocation of 174 new houses with access on Grane Road? yes

Further comments you may wish to make (Please continue overleaf if necessary): When I originally moved onto Grane Rd it was a quiet 'B' road. The waggon and amount of traffic damages my property, causing dust to settle on my windows and window sills. I have witnessed serious accidents on Grane Rd due to the amount of traffic and speed. The speed cameras have not reduced the speed of traffic and this is endorsed by the amount of speeding fines issues. Grane Rd cannot tolerate anymore traffic which would certainly be caused by more houses.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5184 Mr	Keith	Dobbs	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	43 yrs			
Are you concerned about the amount of traffic using Grane Road?	Yes			
Does the speed of traffic using Grane Road worry you?	yes			
Does the traffic noise concern you?	yes			
Can you feel the vibration in your property when HGV's pass?	yes			
Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	yes			
Does the volume of traffic make you feel afraid when walking along Grane Road?	yes			
Do you experience difficulty crossing Grane Road due to the amount of traffic?	yes			
Is your property affected by excessive dust caused by passing traffic?	yes			
Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	no			
Does the volume of traffic affect your quality of life, if so please explain how?	Yes. The volume of traffic and noise, dust, fumes.			
Do you think a roundabout at the Cemetery would aid road safety?	No			
Do you drive a vehicle?	yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	yes			
b. How many minutes does this take (please circle)	1-5			
Do you object to the allocation of 174 new houses with access on Grane Road?	yes			
Further comments you may wish to make (Please continue overleaf if necessary):	Building these houses will accommodate approx 700 people. Will need approx 350 school places. 700 people to register with a doctor. Will use approx 56,000 - 70,000 gallons of water per day. Grane Road can expect approx 350 cars extra.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5185 Mr Keith Hope**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 2 years

Are you concerned about the amount of traffic using Grane Road? Yes

Does the speed of traffic using Grane Road worry you? yes

Does the traffic noise concern you? no

Can you feel the vibration in your property when HGV's pass? yes

Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? yes

Does the volume of traffic make you feel afraid when walking along Grane Road? yes

Do you experience difficulty crossing Grane Road due to the amount of traffic? yes

Is your property affected by excessive dust caused by passing traffic? no

Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? no

Does the volume of traffic affect your quality of life, if so please explain how? no

Do you think a roundabout at the Cemetery would aid road safety? No

Do you drive a vehicle? no

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?

b. How many minutes does this take (please circle)

Do you object to the allocation of 174 new houses with access on Grane Road? yes

Further comments you may wish to make (Please continue overleaf if necessary): It is the innocent of wildlife that would be affected. These are deer, rabbits, rare newts have been seen in a pond on the said land.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5187 Ms	Laura	Drew	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	1 year			
Are you concerned about the amount of traffic using Grane Road?	Yes			
Does the speed of traffic using Grane Road worry you?	yes			
Does the traffic noise concern you?	yes			
Can you feel the vibration in your property when HGV's pass?	yes			
Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	no			
Does the volume of traffic make you feel afraid when walking along Grane Road?	yes			
Do you experience difficulty crossing Grane Road due to the amount of traffic?	yes			
Is your property affected by excessive dust caused by passing traffic?	no			
Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	no			
Does the volume of traffic affect your quality of life, if so please explain how?	no			
Do you think a roundabout at the Cemetery would aid road safety?	yes			
Do you drive a vehicle?	yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	yes			
b. How many minutes does this take (please circle)	1-5			
Do you object to the allocation of 174 new houses with access on Grane Road?	yes			
Further comments you may wish to make (Please continue overleaf if necessary):	I feel Grane Road, as many as others, was not built for the amount of vehicles that use it for a shortcut to the M65 and Blackburn and as such it has become extremely busy. There are tails of cars up to 30 at once and this creates a 'wall' of traffic resulting in issues when either trying to join Grane Road from a junction or from a driveway. The 50 mph zone on Grane Road, albeit beneficial for reducing speed/accidents, contributes towards this wall of cars. A roundabout located at the cemetery would assist in breaking up this wall of traffic. At times, I have to wait a number of minutes to exit my vehicle when parked road side due to the cars and the width of the road.			
An addition of 174 homes will only increase this issue. Most houses have at last 2 vehicles and so we are looking at around 348 vehicles more using Grane Road. Pedestrian crossings are a must as it becomes a real danger on peak times to cross Grane Road. If the houses are to be built, then I feel certain criterias must be met. Haslingden has currenly a large number of social housing and as an industrial town, has rows of terrace housing. As such the area lacks substantial 4-bed detached houses which I feel should be the majority. This will also bring working families to the area and boost the local economy.				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5189 Mr Leon Bottomley**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 13 years

Are you concerned about the amount of traffic using Grane Road? Yes

Does the speed of traffic using Grane Road worry you? yes

Does the traffic noise concern you? no

Can you feel the vibration in your property when HGV's pass? no

Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? no

Does the volume of traffic make you feel afraid when walking along Grane Road? yes

Do you experience difficulty crossing Grane Road due to the amount of traffic? yes

Is your property affected by excessive dust caused by passing traffic? no

Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? no

Does the volume of traffic affect your quality of life, if so please explain how? Yes, too many non residents from Grane Rd etc, that double park dangerously on our street.

Do you think a roundabout at the Cemetery would aid road safety? yes

Do you drive a vehicle? yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?

b. How many minutes does this take (please circle) 5-10

Do you object to the allocation of 174 new houses with access on Grane Road? yes

Further comments you may wish to make (Please continue overleaf if necessary): Grane Rd is already too busy and takes forever to get off our street. What schools, doctors etc. will be available to cope with all the extra houses? Average 4 people per house = approx 700 extra people.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5190 Ms	Lorraine	Hamilton	Number of supporters:
Commenting on				H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	18 years			
Are you concerned about the amount of traffic using Grane Road?	Yes			
Does the speed of traffic using Grane Road worry you?	yes			
Does the traffic noise concern you?	yes			
Can you feel the vibration in your property when HGV's pass?	no			
Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	no			
Does the volume of traffic make you feel afraid when walking along Grane Road?	yes			
Do you experience difficulty crossing Grane Road due to the amount of traffic?	yes			
Is your property affected by excessive dust caused by passing traffic?	yes			
Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	yes			
Does the volume of traffic affect your quality of life, if so please explain how?	no			
Do you think a roundabout at the Cemetery would aid road safety?	yes			
Do you drive a vehicle?	yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	yes			
b. How many minutes does this take (please circle)	5-10			
Do you object to the allocation of 174 new houses with access on Grane Road?	yes			
Further comments you may wish to make (Please continue overleaf if necessary):	Green Belt land is very precious and any development would have a detrimental impact on not only the construction site, but furthermore on increased congestion, long term on Grane Rd which is bad enough at present.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5191 Ms Lynda Robson**

Number of supporters:

Commenting on

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 18 years

Are you concerned about the amount of traffic using Grane Road? Yes

Does the speed of traffic using Grane Road worry you? yes

Does the traffic noise concern you? yes

Can you feel the vibration in your property when HGV's pass? yes

Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? yes

Does the volume of traffic make you feel afraid when walking along Grane Road? yes

Do you experience difficulty crossing Grane Road due to the amount of traffic? yes

Is your property affected by excessive dust caused by passing traffic? yes

Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? no

Does the volume of traffic affect your quality of life, if so please explain how? Yes as above

Do you think a roundabout at the Cemetery would aid road safety? no

Do you drive a vehicle? yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? yes

b. How many minutes does this take (please circle) 1-5

Do you object to the allocation of 174 new houses with access on Grane Road? yes

Further comments you may wish to make (Please continue overleaf if necessary): Volume of traffic on Grane Road is already unacceptable due to location of bypass. Schools are already at full capacity, Waiting time for doctor's appointment excessive. A roundabout at the cemetery would not affect the constant flow of traffic by the time it reaches Holden Place. The impact of 174 houses in this location is far too excessive.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5198 Ms	Dorothy	Walker	Number of supporters:
Commenting on		HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	35			
1. Are you concerned about the amount of traffic using Grane Road?	Yes			
2. Does the speed of traffic using Grane Road worry you?	Yes			
3. Does the traffic noise concern you?	Yes			
4. Can you feel the vibration in your property when HGV's pass? When they do go past.	Yes			
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Could hear stuff falling inside the walls.	Yes			
6. Does the volume of traffic make you feel afraid when walking along Grane Road?	Yes			
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes			
8. Is your property affected by excessive dust caused by passing traffic?	Yes			
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	Yes			
10. Does the volume of traffic affect your quality of life, if so please explain how?	Yes. Noisy, dirty and dangerous when crossing.			
11. Do you think a roundabout at the Cemetery would aid road safety?	Yes			
12. Do you drive a vehicle?	Yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	Yes			
b. How many minutes does this take (please circle) 5-10 More at peak times				
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes			
Further comments you may wish to make (Please continue overleaf if necessary):	The traffic is still too fast, despite the average speed cameras. Access on Grane Road would cause problems for people getting in and out and more problems for pedestrians crossing on foot.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5199 Mrs Lynn Wade**

Number of supporters:

Commenting on HS2 H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 16 years

1. Are you concerned about the amount of traffic using Grane Road? Yes
2. Does the speed of traffic using Grane Road worry you? Yes
3. Does the traffic noise concern you? No
4. Can you feel the vibration in your property when HGV's pass? No
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No
6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes
8. Is your property affected by excessive dust caused by passing traffic? No
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes
10. Does the volume of traffic affect your quality of life, if so please explain how? No
11. Do you think a roundabout at the Cemetery would aid road safety? Possibly
12. Do you drive a vehicle? Yes
 - a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes
 - b. How many minutes does this take (please circle) 1-5
13. Do you object to the allocation of 174 new houses with access on Grane Road? (No answer)

Further comments you may wish to make (Please continue overleaf if necessary):

I think it would be even more problematic at peak times with the amount of traffic trying to join Grane Road and join the slip road to the motorways.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5200 Mr	M	Riley	Number of supporters:
Commenting on		HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address? 50 Years				
1. <input checked="" type="checkbox"/> Are you concerned about the amount of traffic using Grane Road? Yes				
2. <input checked="" type="checkbox"/> Does the speed of traffic using Grane Road worry you? Yes				
3. <input checked="" type="checkbox"/> Does the traffic noise concern you? Yes				
4. <input checked="" type="checkbox"/> Can you feel the vibration in your property when HGV's pass? Yes				
5. <input checked="" type="checkbox"/> Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes				
6. <input checked="" type="checkbox"/> Does the volume of traffic make you feel afraid when walking along Grane Road? Yes				
7. <input checked="" type="checkbox"/> Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes				
8. <input checked="" type="checkbox"/> Is your property affected by excessive dust caused by passing traffic? Yes				
9. <input checked="" type="checkbox"/> Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes COPD				
10. <input checked="" type="checkbox"/> Does the volume of traffic affect your quality of life, if so please explain how? Air pollution / urgent				
11. <input checked="" type="checkbox"/> Do you think a roundabout at the Cemetery would aid road safety? Yes				
12. <input checked="" type="checkbox"/> Do you drive a vehicle? Yes				
a. <input checked="" type="checkbox"/> If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes				
b. <input checked="" type="checkbox"/> How many minutes does this take (please circle) <input checked="" type="checkbox"/> 1-5 <input checked="" type="checkbox"/> 5-10 (Both ticked)				
13. <input checked="" type="checkbox"/> Do you object to the allocation of 174 new houses with access on Grane Road? Yes				
Further comments you may wish to make (Please continue overleaf if necessary):				
Local Infrastructure ?				
Local services, dentists, doctors, health services, schools, sewage, water				
All are under stress without more housing				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5201**

Margaret

Kerr

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 58 Years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? ?

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Trying to exit my street on to Grane Road by car when it is necessary to go out.

11. Do you think a roundabout at the Cemetery would aid road safety? No

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) More

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Do not go out around 7am – 10am and 5pm – 7pm as I am scared to cross Grane Rd to visit friends because of traffic.

Continued from petition against building in Grane.

RE:- Protest against building houses/apartments on Grane Road Haslingden.

1) Many residents especially elderly/vulnerable suffer respiratory ailments such as COPD, asthma which medical authorities consider dust and exhaust fumes are responsible for these problems.

2) Elderly and vulnerable residents are afraid to cross the road to visit friends, catch the bus into town (some elderly residents catch the bus on the same side of their homes and travel the long way round to go to town). Granted there is a crossing on Grane Road but it's a long way for some residents to use that crossing.

3) Is the council aware that many wildlife have been seen in the area including Deer (photo evidence), Bats, (Protected species), newts, owls several species of birds live in our area.

4) For residents living in the Warburton Street area, i.e. Warburton Buildings and Musbury View it takes several minutes for motorists to exit the street and drive onto Grane Road.

5) Surely our Councils are pledged to look after the residents they are representing.

a. What benefit to our community is the proposal to build 174 residential properties?

b. What benefit will there be for wildlife if the whole area is decimated for housing?

c. What value would be given to our properties in the Warburton Street, Buildings and Musbury View area plus those on Grane Road?

6) These highlighted issue beg the question, has anyone from RB council visited Grane and assessed the situation? Maybe then they would understand the residents concerns.

7) It's not that we are objecting to houses being built, it's the amount. One hundred and seventy houses will swallow up most of the land. Not to mention that so many homes would in all probability have at least two cars. Point that in itself going to cause more traffic problems for motorists/residents living in the area?

8) When the business park behind Warburton Street on Grane Road was built two steps leading from the outer backs of the street were built. This leads on to Gas Lane. Whenever it is stormy weather or rains heavily, stones, dirt and dust is swept down Grane Road and runs down Gas Lane and over the two steps onto outer backs. It quietly becomes like slurry and makes a mess down our backs. When/if this development goes ahead what can be done for the residents to divert this slurry from our houses?

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5202**

Margaret

Murray

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 43 Years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. It is a nightmare, especially trying to cross the road.

11. Do you think a roundabout at the Cemetery would aid road safety? Yes

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Construction on this site would seriously affect our health and wellbeing. It is the wrong place for such a development and is against the wishes of residents who live here. It would also have a serious impact on the wildlife, including deer, which inhabit the site.

Re: Rossendale Draft Local Plan

Pre-Submission Publication Version, Regulation 19 Consultation

Boundary change to facilitate 174 houses at Site H74

I write to you as a resident directly affected by the proposal to designate the above site for housing. I state my views in the following paragraphs which are on similar lines to those previously submitted on 27 September 2017, as I believe little has changed to alter my opinion of the proposed housing allocation.

Loss of light or overshadowing/Noise and Disturbance/Nature and Conservation/Landscaping

I would prefer to see the green fields undeveloped for reasons of habitat conservation and animal grazing, although they have been left to lie fallow for a number of years, possibly with the aim of allowing the land to deteriorate with a view to offering it for sale as suitable for development. The open aspect which our home enjoys has been appreciated by my family for the past 43 years and by past generations of my family since the house was built in 1914. I accept however, that objection to the proposals will be hard fought when landowners are willing to sell to a developer such as Taylor Wimpy.

Until now we have had uninterrupted views of Tor and the surrounding countryside, which was one of the reasons for buying our property. My husband and I take a pride in our garden which has been created over a long period, and which provides a quiet, peaceful and private area in which to relax. No doubt these reasons do not fit in with the legitimate planning criteria for objection but I feel that they should be noted and bear as much weight as the developer's comments in their Master Plan which states:

"The Council's Landscape Assessment recommended that planned gaps in the layout of the site should be used to retain views to Tor Hill. It is not considered that the existing

view to Tor Hill from the identified viewpoint on Grane Road is of exceptional quality due to the visual influence of the large scale industrial buildings which dominate the foreground to the left of the view. As such it is not considered that the quality of this existing view is high enough to require the entire view line to be kept free from development."

I totally disagree with this analysis, as I am sure do the residents who are fortunate enough to still enjoy such a view. Ours is one of a small number of properties directly overlooking the proposed site and I believe that should such a development be contemplated, there should be sufficient distance between old and new properties to maintain views and privacy. I should add at this point that the industrial development referred to by the developer was railroaded through planning, hard fought by Grane Residents' Association and built in a style which is not conducive to the locality. Local residents should not be further penalised for Planners' mistakes.

Highways Safety/Noise and Disturbance resulting from use

Grane Road is notoriously busy, with the traffic travelling its length increasing year on year. I support the safety measures campaigned for by Grane Residents' Association and the improvements implemented to aid road safety, including the average speed cameras along the length of Grane Road from Blackburn to Haslingden. We understand that Lancashire County Council is insistent that the access point for any housing development will not be situated on Grane Road. However, even if the access point should be re-located to Holcombe Road, the development of 174houses, with an estimated 350 resident cars, plus service and emergency vehicles, will put enormous strain onto the already saturated Grane Road, reducing our quality of life 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 our house, caused by passing heavy goods vehicles is substantial and detrimental to our property and recent rendering to the rear of our property, at great expense, is already showing signs of deterioration. 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 if access to the site is changed. A roundabout at the Holden Arms junction would be beneficial generally and would aid the flow of traffic. I would however, oppose the implementation of traffic lights as a solution, on the grounds that this will cause disturbance to residents, impact on air quality and health due to idling vehicles waiting at the traffic lights, cause tailbacks at peak periods, take away parking facilities from outside our homes and create a danger to emergency services.

Loss of Trees/Visual Amenity/Wildlife

Since the proposed site ceased to be used for farming it has been allowed to grow wild. This has had an unexpected benefit in that it has expanded the variety of species which now inhabit the site including, deer, newts, rabbits, bats, barn owls, foxes, frogs and toads to name but a few. The loss of trees and greenery which will result, should the current site plans go ahead, would be a major loss as the site is on the very edge of the truly beautiful Grane Valley, an area which has a number of well used trails, the reservoirs and Tor. Rossendale's natural beauty needs to be conserved for residents and tourists alike. This is yet another green space which if developed, will change the village as we know it and make it unrecognisable. The Council has a responsibility to its constituents, not merely to meet the needs of developers who have the funds to fight opposition to their plans.

Drainage of site

Drainage and standing water on the site is already a problem and with changing weather patterns could pose a serious risk of flooding should development take place. The land is currently saturated, with water backing up into our gardens and with standing water on Grane Road during heavy downpours, adding further danger to the road.

I trust that these comments will be noted and that Grane Residents' Association will be kept informed of the developer's future plans, together with the results of their site

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5204**

Mary

Bass

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 24 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Impacts on times I leave / arrive home. Try to avoid activities which start/end before 9:30 or 4-7pm

11. Do you think a roundabout at the Cemetery would aid road safety? Yes. Or traffic lights at peak times

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 1-5 (From House) 5-10 (From Holcombe Road Right Turn)

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Opening/getting out of driver's door in traffic when parked takes even longer than joining flow of traffic when driving/indicating.

Also concerned regarding impact on local services e.g. GPs

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5205	Mary	Garlick	Number of supporters:
Commenting on		HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	60+ years			
1.	<input checked="" type="checkbox"/> Are you concerned about the amount of traffic using Grane Road? Yes			
2.	<input checked="" type="checkbox"/> Does the speed of traffic using Grane Road worry you? Yes			
3.	<input checked="" type="checkbox"/> Does the traffic noise concern you? Yes			
4.	<input checked="" type="checkbox"/> Can you feel the vibration in your property when HGV's pass? Yes			
5.	<input checked="" type="checkbox"/> Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No			
6.	<input checked="" type="checkbox"/> Does the volume of traffic make you feel afraid when walking along Grane Road? Yes			
7.	<input checked="" type="checkbox"/> Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes			
8.	<input checked="" type="checkbox"/> Is your property affected by excessive dust caused by passing traffic? Yes			
9.	<input checked="" type="checkbox"/> Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes			
10.	<input checked="" type="checkbox"/> Does the volume of traffic affect your quality of life, if so please explain how? Yes			
11.	<input checked="" type="checkbox"/> Do you think a roundabout at the Cemetery would aid road safety? No			
12.	<input checked="" type="checkbox"/> Do you drive a vehicle? No			
a.	<input checked="" type="checkbox"/> If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?			
b.	<input checked="" type="checkbox"/> How many minutes does this take (please circle) 2			
13.	<input checked="" type="checkbox"/> Do you object to the allocation of 174 new houses with access on Grane Road? Yes			
Further comments you may wish to make (Please continue overleaf if necessary):				
Traffic and noise have increased over the years, very badly. I live by myself and have been here many years it is going worse and in my opinion it is not acceptable. Very dangerous for my family when visiting and also for my neighbours. This use to be a lovely place to live, but not anymore.				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5206**

Michael

Gilere

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 20 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Noise

11. Do you think a roundabout at the Cemetery would aid road safety? Yes

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 1-5

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Traffic and noise have increased over the years, very badly. I live by myself and have been here many years it is going worse and in my opinion it is not acceptable.

Very dangerous for my family when visiting and also for my neighbours. This use to be a lovely place to live, but not anymore.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5207 Mr	Michael	Murray	Number of supporters:
Commenting on		HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address? 43 years				
1. <input checked="" type="checkbox"/> Are you concerned about the amount of traffic using Grane Road? Yes				
2. <input checked="" type="checkbox"/> Does the speed of traffic using Grane Road worry you? Yes				
3. <input checked="" type="checkbox"/> Does the traffic noise concern you? Yes				
4. <input checked="" type="checkbox"/> Can you feel the vibration in your property when HGV's pass? Yes				
5. <input checked="" type="checkbox"/> Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes				
6. <input checked="" type="checkbox"/> Does the volume of traffic make you feel afraid when walking along Grane Road? Yes				
7. <input checked="" type="checkbox"/> Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes				
8. <input checked="" type="checkbox"/> Is your property affected by excessive dust caused by passing traffic? Yes				
9. <input checked="" type="checkbox"/> Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No				
10. <input checked="" type="checkbox"/> Does the volume of traffic affect your quality of life, if so please explain how? Yes. Many difficulties as walker & driver				
11. <input checked="" type="checkbox"/> Do you think a roundabout at the Cemetery would aid road safety? Yes				
12. <input checked="" type="checkbox"/> Do you drive a vehicle? Yes				
a. <input checked="" type="checkbox"/> If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes				
b. <input checked="" type="checkbox"/> How many minutes does this take (please circle) 5-10 <input checked="" type="checkbox"/> More (Sometimes) <input type="checkbox"/>				
13. <input checked="" type="checkbox"/> Do you object to the allocation of 174 new houses with access on Grane Road? Yes				
Further comments you may wish to make (Please continue overleaf if necessary):				
We know that site H74 is habitat for a wide variety of species including bats. Has a survey been carried out to determine whether they are roosting on site as they are protected species? They have been seen and Council should carry out survey.				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5208**

Miriam

Hophenson

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 10 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? No

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? No

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? No

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Unable to turn out of the road in the car, difficulty crossing, concern about pets & children when using footpath.

11. Do you think a roundabout at the Cemetery would aid road safety? No

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? (No answer)

b. How many minutes does this take (please circle) 1-5 5-10 (Both circled – depends on time of day)

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Grane Rd is already unfit for purpose due to the volume of traffic/queues for the slip road. I feel very sorry for the residents on Grane Rd. The noise, dirt and pollution those residents are exposed to is unacceptable. It is a dangerous road to cross and unpleasant to walk along. The increase to traffic of around 300 cars is hardly going to help. There are very few services already – shops, schools, public transport and doctors surgeries. They are not accessible without a car. The land is very important for wild life who use it to travel around. It is used by bats who feed there and will have a considerable impact.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5209 Miss	Vera	Price	Number of supporters:
Commenting on			HS2	H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address? 77 years				
1. Are you concerned about the amount of traffic using Grane Road? Yes				
2. Does the speed of traffic using Grane Road worry you? Yes				
3. Does the traffic noise concern you? Yes				
4. Can you feel the vibration in your property when HGV's pass? No				
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No				
6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes				
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes				
8. Is your property affected by excessive dust caused by passing traffic? No				
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No				
10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Too much traffic, not like it used to be.				
11. Do you think a roundabout at the Cemetery would aid road safety? No				
12. Do you drive a vehicle? Not anymore				
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes. Used to.				
b. How many minutes does this take (please circle) None circled				
13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes				
Further comments you may wish to make (Please continue overleaf if necessary):				
Against it ridiculous to think about building further houses on Grane Road. Too much traffic already. 26,000 motorists have been fined for speeding since average speed cameras introduced. Used to be a peaceful village.				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5210 Mr &
Mrs**

Fairhurst

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 14 years

1. Are you concerned about the amount of traffic using Grane Road? Yes
2. Does the speed of traffic using Grane Road worry you? Yes
3. Does the traffic noise concern you? Yes
4. Can you feel the vibration in your property when HGV's pass? Yes
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No
6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes
8. Is your property affected by excessive dust caused by passing traffic? No
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No
10. Does the volume of traffic affect your quality of life, if so please explain how? No
11. Do you think a roundabout at the Cemetery would aid road safety? Yes
12. Do you drive a vehicle? Yes
 - a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes
 - b. How many minutes does this take (please circle) 1-5
13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Most houses have at least two vehicles, so 174 houses are most certainly going to increase traffic in the area. Furthermore our schools and other facilities are up to capacity in this area. A mini roundabout was supposed to have been sited at the junction of Grane/Holcombe Road, but it never materialised when the speed cameras were introduced. If a mini roundabout were sited at the location I'm sure traffic could flow more freely from Holcombe Road onto Grane Road. All it needs is some white line paint, so the cost would be minimal to the council.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5211 Mr & Mrs	J. B.	Collinge	Number of supporters:
Commenting on		HS2		H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address? 45 years				
1. Are you concerned about the amount of traffic using Grane Road? Yes				
2. Does the speed of traffic using Grane Road worry you? Yes				
3. Does the traffic noise concern you? Yes				
4. Can you feel the vibration in your property when HGV's pass? Yes				
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes				
6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes				
7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes				
8. Is your property affected by excessive dust caused by passing traffic? Yes				
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No answer				
10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Getting across the road to post a letter / catch a bus entails a walk to the crossway & back. If a person with mobility issues, this can be debilitating.				
11. Do you think a roundabout at the Cemetery would aid road safety? No.				
12. Do you drive a vehicle? No				
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes. Only just stopped driving, so have far many years had experience of this.				
b. How many minutes does this take (please circle) More				
13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes				
Further comments you may wish to make (Please continue overleaf if necessary):				
The volume of traffic from more houses would only add to the present problems.				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5212 Mr B Russell**

Number of supporters:

Commenting on **HS2** **H74**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? (No answer)

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? No answer

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No answer

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? No answer

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. HGV go to Solomons off Holcombe Rd

11. Do you think a roundabout at the Cemetery would aid road safety? Yes

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) More

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Have we doctors, schools, playing fields for children to cope.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5215 Mrs Irene Entwistle	Number of supporters:
Commenting on	HS2	H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer
Does the Local Plan complies with the duty to co-operate?	Did not answer	
How long have you lived at the above address?	36 years	
1. Are you concerned about the amount of traffic using Grane Road?	Yes	
2. Does the speed of traffic using Grane Road worry you?	Yes	
3. Does the traffic noise concern you?	Yes	
4. Can you feel the vibration in your property when HGV's pass?	No	
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	No	
6. Does the volume of traffic make you feel afraid when walking along Grane Road?	Yes	
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes	
8. Is your property affected by excessive dust caused by passing traffic?	No	
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	No	
10. Does the volume of traffic affect your quality of life, if so please explain how?	Yes	
11. Do you think a roundabout at the Cemetery would aid road safety?	Yes	
12. Do you drive a vehicle?	No	
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? (No answer)		
b. How many minutes does this take (please circle) 5-10		
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes	
Further comments you may wish to make (Please continue overleaf if necessary):	What do I think about Grane Rd. it is awful with all of the traffic just can not get over the road. Don't talk about 174 more houses. What is it going to like then.	
Do you wish to participate to the Examination In Public?	Did not answer	Reasons

Reference **5217 Mrs L R Muskett**

Number of supporters:

Commenting on HS2 H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Re:- Proposed plan H74 "Grane Village"

We have lived on Grane Road for the past 33 years only having to put up with the road BUT now you want to surround our house/garden with apartments/houses and the road coming up beside our drive. Surely you can see that we will be surrounded and overlooked on these 3 sides.

Traffic leaving the estate will be constant all day, no privacy.

We are opposed to this development and the proposal of (at least 2 cars per house) exiting on to Grane Road is extremely dangerous.

Please see our enclosed map showing you the reasons we are against the unnecessary development.

This proposed land is extremely boggy, as we can tell from our garden (outside our wall) so what is it going to be like when you (hopefully not) start putting 174 houses, plus roads etc. there

We are completely against the whole idea of a housing estate on these fields.

Have you considered the impact on our schools which we believe are overflowing, transport etc.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5218 Mrs	Marjorie	Kay	Number of supporters:
Commenting on		HS2		H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	53 years			
1. Are you concerned about the amount of traffic using Grane Road?	Yes			
2. Does the speed of traffic using Grane Road worry you?	Yes			
3. Does the traffic noise concern you?	No			
4. Can you feel the vibration in your property when HGV's pass?	Yes			
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	No			
6. Does the volume of traffic make you feel afraid when walking along Grane Road?	Yes			
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes			
8. Is your property affected by excessive dust caused by passing traffic?	Yes			
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	Yes			
10. Does the volume of traffic affect your quality of life, if so please explain how?	Yes. Not like it used to be			
11. Do you think a roundabout at the Cemetery would aid road safety? (No answer)				
12. Do you drive a vehicle?	No. Children takes me out.			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	Yes			
b. How many minutes does this take (please circle)	More			
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes			
Further comments you may wish to make (Please continue overleaf if necessary):	This was a village, under no circumstances should we have 174 houses with 2 cars each using this very busy road, no, no, no!			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5219 Mrs Mary Isabel Nuttall**

Number of supporters:

Commenting on **HS2** **H74**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? Since July 1940 (78 years)

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Must sleep with bedroom window closed, otherwise passing traffic would disturb sleeping.

11. Do you think a roundabout at the Cemetery would aid road safety? (No answer)

12. Do you drive a vehicle? No

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? (No answer)

b. How many minutes does this take (please circle) (No answer)

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

11) Is there room for a roundabout at the cemetery? Traffic lights are needed urgently

7) Crossing – extreme difficulty, especially early mornings and late afternoons when traffic is at its highest. You take your life in your hands. A pedestrian crossing is most urgently needed.

13) The building site is not suitable, when considering the tremendous weight of traffic on Grane Road, making the approach to and departure from the housing estate extremely difficult and time consuming.

I would prefer to look out on England's green and pleasant land, rather than built up area. Soon there will be no green land left!

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5221	Muskett	Number of supporters:
Commenting on	HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	33 years		
1. Are you concerned about the amount of traffic using Grane Road?	Yes		
2. Does the speed of traffic using Grane Road worry you?	Yes		
3. Does the traffic noise concern you?	Yes		
4. Can you feel the vibration in your property when HGV's pass?	Yes		
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	Yes		
6. Does the volume of traffic make you feel afraid when walking along Grane Road?	Yes		
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes		
8. Is your property affected by excessive dust caused by passing traffic?	Yes		
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	No		
10. Does the volume of traffic affect your quality of life, if so please explain how?	Yes. Traffic/fumes. Even walking on the pavement is dangerous.		
11. Do you think a roundabout at the Cemetery would aid road safety?	No		
12. Do you drive a vehicle?	Yes		
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	Yes		
b. How many minutes does this take (please circle) 1-5			
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes		
Further comments you may wish to make (Please continue overleaf if necessary):			
Why don't you consider somewhere else to house people.	Living on Grane Road is not pleasant. My house will be surrounded by your proposed "houses"		
Had a friend over from California and the noise and vibration cause her to think we were having an earthquake. She could not believe it was traffic on Grane Road that was a few years ago – can you imagine how it would be NOW.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons	

Reference **5222**

Natalie & Rhys Heap

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 1 ½ year

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. We have a young baby that's woken from big vehicles

11. Do you think a roundabout at the Cemetery would aid road safety? No

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

We have a lot of wildlife which we see regular. Parking with a baby is hard a walking with the dog hes scared of the traffic.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5224 Mr Paul Robinson	Number of supporters:
Commenting on	HS2	H74
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? Did not answer
Does the Local Plan complies with the duty to co-operate? Did not answer		
How long have you lived at the above address? 5 years		
1. <input checked="" type="checkbox"/> Are you concerned about the amount of traffic using Grane Road? Yes		
2. <input checked="" type="checkbox"/> Does the speed of traffic using Grane Road worry you? Yes		
3. <input checked="" type="checkbox"/> Does the traffic noise concern you? No		
4. <input checked="" type="checkbox"/> Can you feel the vibration in your property when HGV's pass? No		
5. <input checked="" type="checkbox"/> Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No		
6. <input checked="" type="checkbox"/> Does the volume of traffic make you feel afraid when walking along Grane Road? Yes		
7. <input checked="" type="checkbox"/> Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes		
8. <input checked="" type="checkbox"/> Is your property affected by excessive dust caused by passing traffic? Yes		
9. <input checked="" type="checkbox"/> Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No		
10. <input checked="" type="checkbox"/> Does the volume of traffic affect your quality of life, if so please explain how? No		
11. <input checked="" type="checkbox"/> Do you think a roundabout at the Cemetery would aid road safety? Yes		
12. <input checked="" type="checkbox"/> Do you drive a vehicle? Yes		
a. <input checked="" type="checkbox"/> If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes		
b. <input checked="" type="checkbox"/> How many minutes does this take (please circle) 5-10		
13. <input checked="" type="checkbox"/> Do you object to the allocation of 174 new houses with access on Grane Road? Yes		
Further comments you may wish to make (Please continue overleaf if necessary):		
Do you wish to participate to the Examination In Public?	Did not answer	Reasons

Reference **5225**

R

Entwistle

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 34 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Constant flow of traffic – day & night

11. Do you think a roundabout at the Cemetery would aid road safety? Yes

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Grane Rd already has max volume of traffic. Any more would grid lock the road. There is no provision for parking. Crossing the road at peak times is impossible.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5226 Mr	Rodney	Grundy	Number of supporters:
Commenting on		HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address? 35 years				
1. <input checked="" type="checkbox"/> Are you concerned about the amount of traffic using Grane Road? Yes				
2. <input checked="" type="checkbox"/> Does the speed of traffic using Grane Road worry you? Yes				
3. <input checked="" type="checkbox"/> Does the traffic noise concern you? Yes				
4. <input checked="" type="checkbox"/> Can you feel the vibration in your property when HGV's pass? Yes				
5. <input checked="" type="checkbox"/> Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes. Cracks were caused in the ceiling due to piling in the construction of the industrial units off Grane Road.				
6. <input checked="" type="checkbox"/> Does the volume of traffic make you feel afraid when walking along Grane Road? Yes				
7. <input checked="" type="checkbox"/> Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes				
8. <input checked="" type="checkbox"/> Is your property affected by excessive dust caused by passing traffic? Yes. Down Gas Street				
9. <input checked="" type="checkbox"/> Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes				
10. <input checked="" type="checkbox"/> Does the volume of traffic affect your quality of life, if so please explain how? Yes. I have a problem trying to drive out of Musbury View onto Grane Road or trying to cross the road to the post box, or bus stop to Rawtenstall.				
11. <input checked="" type="checkbox"/> Do you think a roundabout at the Cemetery would aid road safety? No. This would probably cause more accidents.				
12. <input checked="" type="checkbox"/> Do you drive a vehicle? Yes				
a. <input checked="" type="checkbox"/> If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes				
b. <input checked="" type="checkbox"/> How many minutes does this take (please circle) 5-10 (Sometimes More)				
13. <input checked="" type="checkbox"/> Do you object to the allocation of 174 new houses with access on Grane Road? Yes				
Further comments you may wish to make (Please continue overleaf if necessary):				
The increase of 174 houses would cause chaos to the area because of the following				
1) <input checked="" type="checkbox"/> The extra no. of vehicles using Grane Road, which is already a notorious road for accidents and volume of traffic. Further danger for pedestrians.				
2) <input checked="" type="checkbox"/> Inadequate bus service / only 1 bus per hour and nothing on Sunday, no service in the evenings. Possibly not enough room in schools in the area.				
3) <input checked="" type="checkbox"/> The ground selected is very wet and would probably need heavy piling to raft the properties. The noise would be excessive and would probably do damage to the property. This happened when the piling was done for the industrial units off Grane Road. This new development would be even closer to my property. I do not want this to happen and I object to this development going ahead.				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5228**

Seddon

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 37 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Dust, noise and vibration is bad enough, in summer with the windows open it is horrendous.

11. Do you think a roundabout at the Cemetery would aid road safety? No.

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

The amount of traffic is bad enough, and with most families having at least two cars the building of 174 homes is a potential increase of 350 vehicles all trying to get onto Grane Rd. which is already near impossible. The speed cameras seem to have made little difference, going off the number of people being fined each month.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5229	Shawny	Flitcroft	Number of supporters:
Commenting on		HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	1 year			
1.	Are you concerned about the amount of traffic using Grane Road? Yes			
2.	Does the speed of traffic using Grane Road worry you? Yes			
3.	Does the traffic noise concern you? Yes			
4.	Can you feel the vibration in your property when HGV's pass? Yes			
5.	Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No			
6.	Does the volume of traffic make you feel afraid when walking along Grane Road? Yes			
7.	Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes			
8.	Is your property affected by excessive dust caused by passing traffic? Yes			
9.	Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes			
10.	Does the volume of traffic affect your quality of life, if so please explain how? Yes. Can't open windows			
11.	Do you think a roundabout at the Cemetery would aid road safety? Yes			
12.	Do you drive a vehicle? Yes			
a.	If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes			
b.	How many minutes does this take (please circle) 5-10			
13.	Do you object to the allocation of 174 new houses with access on Grane Road? Yes			
Further comments you may wish to make (Please continue overleaf if necessary):	Too much traffic, not safe, pollution, noise, parking, shouldn't be building on anymore land, wildlife			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5230**

Stewart

Pugh

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 15 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Noise and dangerous to even get to car at times

11. Do you think a roundabout at the Cemetery would aid road safety? (No answer)

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 5-10

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

To get to work I avoid Holcombe Rd junction at all costs to Grane Rd. Takes time to even get car door open the traffic is that busy. I have had damage to both cars and costly repairs to the house due to huge amount of rendering falling off gable end. This has been replaced but cracks are showing already due to vibration of the building caused by traffic.

Environment issues. I have seen deer on several occasions on the planned site. Daily sightings of bats and barn owls are not uncommon at dusk. Toads are a regular visitor to our gardens. The site I feel could cause severe water run off if developed as it acts like a natural soak away being the lowest point in the area.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5231	Theresa	Brown	Number of supporters:
Commenting on		HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	18 years			
1. Are you concerned about the amount of traffic using Grane Road?	Yes			
2. Does the speed of traffic using Grane Road worry you?	Yes			
3. Does the traffic noise concern you?	No			
4. Can you feel the vibration in your property when HGV's pass?	Not with HGV's, heavy plant machines cause's vibration			
5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road?	No			
6. Does the volume of traffic make you feel afraid when walking along Grane Road?	No			
7. Do you experience difficulty crossing Grane Road due to the amount of traffic?	Yes			
8. Is your property affected by excessive dust caused by passing traffic?	Yes			
9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint?	No			
10. Does the volume of traffic affect your quality of life, if so please explain how?	No			
11. Do you think a roundabout at the Cemetery would aid road safety?	No. Traffic lights			
12. Do you drive a vehicle?	Yes			
a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road?	Yes			
b. How many minutes does this take (please circle)	More			
13. Do you object to the allocation of 174 new houses with access on Grane Road?	Yes			
Further comments you may wish to make (Please continue overleaf if necessary):	The problem not the house's it the vehicles most family have two cars or more and with traffic coming from Blackburn, the road a nightmare now.			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5232**

Tom

Holden

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 50 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? No

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes

10. Does the volume of traffic affect your quality of life, if so please explain how? Difficulty / Crossing the road

11. Do you think a roundabout at the Cemetery would aid road safety? No

12. Do you drive a vehicle? No

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? No answer

b. How many minutes does this take (please circle) No answer

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Ruining my way of life due to traffic etc. How "Grane" has changed for the worse over the years I have been living here.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5233	Tom	Moran	Number of supporters:
Commenting on		HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
How long have you lived at the above address?	20 years			
1.	Are you concerned about the amount of traffic using Grane Road? Yes			
2.	Does the speed of traffic using Grane Road worry you? Yes			
3.	Does the traffic noise concern you? Yes			
4.	Can you feel the vibration in your property when HGV's pass? Yes			
5.	Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? Yes			
6.	Does the volume of traffic make you feel afraid when walking along Grane Road? Yes			
7.	Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes			
8.	Is your property affected by excessive dust caused by passing traffic? Yes			
9.	Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes			
10.	Does the volume of traffic affect your quality of life, if so please explain how? Yes. Traffic-Noise-Pollution			
11.	Do you think a roundabout at the Cemetery would aid road safety? ?			
12.	Do you drive a vehicle? No			
a.	If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? No			
b.	How many minutes does this take (please circle) No answer			
13.	Do you object to the allocation of 174 new houses with access on Grane Road? Yes			
Further comments you may wish to make (Please continue overleaf if necessary):				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5234**

V & N

Stone

Number of supporters:

Commenting on

HS2

H74

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

How long have you lived at the above address? 21 years

1. Are you concerned about the amount of traffic using Grane Road? Yes

2. Does the speed of traffic using Grane Road worry you? Yes

3. Does the traffic noise concern you? Yes

4. Can you feel the vibration in your property when HGV's pass? Yes

5. Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No

6. Does the volume of traffic make you feel afraid when walking along Grane Road? Yes

7. Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes

8. Is your property affected by excessive dust caused by passing traffic? Yes

9. Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? No

10. Does the volume of traffic affect your quality of life, if so please explain how? Yes. Can no longer walk into Haslingden due to fast moving traffic. Turning right onto Grane dangerous.

11. Do you think a roundabout at the Cemetery would aid road safety? Not sure

12. Do you drive a vehicle? Yes

a. If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes

b. How many minutes does this take (please circle) 1-5

13. Do you object to the allocation of 174 new houses with access on Grane Road? Yes

Further comments you may wish to make (Please continue overleaf if necessary):

Concerns about extra traffic on Grane – plus extra demands on G.P. services, already difficult to get appointments. Also I believe the planned area is attractive to deer, rabbits & fox, birds & butterflies & other species, some of which may be protected. I feel a full survey in this respect is required before planning is considered.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference	5235	Wendy	Boniface		Number of supporters:
Commenting on			HS2	H74	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
How long have you lived at the above address? 21 years					
1. <input type="checkbox"/> Are you concerned about the amount of traffic using Grane Road? Yes					
2. <input type="checkbox"/> Does the speed of traffic using Grane Road worry you? Yes					
3. <input type="checkbox"/> Does the traffic noise concern you? Yes					
4. <input type="checkbox"/> Can you feel the vibration in your property when HGV's pass? No					
5. <input type="checkbox"/> Have you suffered any damage to your property due to vibration and/or impact from vehicles using Grane Road? No					
6. <input type="checkbox"/> Does the volume of traffic make you feel afraid when walking along Grane Road? Yes					
7. <input type="checkbox"/> Do you experience difficulty crossing Grane Road due to the amount of traffic? Yes					
8. <input type="checkbox"/> Is your property affected by excessive dust caused by passing traffic? No					
9. <input type="checkbox"/> Do you or a member of your household suffer from Bronchitis, Asthma or any other respiratory complaint? Yes					
10. <input type="checkbox"/> Does the volume of traffic affect your quality of life, if so please explain how? No answer					
11. <input type="checkbox"/> Do you think a roundabout at the Cemetery would aid road safety? Yes					
12. <input type="checkbox"/> Do you drive a vehicle? Yes					
a. <input type="checkbox"/> If yes to the above, do you experience any difficulty entering the flow of traffic on Grane Road? Yes					
b. <input type="checkbox"/> How many minutes does this take (please circle) More					
13. <input type="checkbox"/> Do you object to the allocation of 174 new houses with access on Grane Road? Yes					
Further comments you may wish to make (Please continue overleaf if necessary):					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

HS2

Reference	39 Mrs	Candice	Harwood	-	Number of supporters:	17
Commenting on	3		Housing supply	HS2		
Is the Local Plan legally compliant?	No	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	No	
The emerging local plan is not sound with regard to site no SHLAA16172 in the Strategic Housing Land Availability Assessment (2018) report for the reasons set out in the accompanying report						
Remove site SHLA17162 from the Urban Boundary and from the list of sites considered suitable for future housing development						
Do you wish to participate to the Examination In Public?	Yes	Reasons To ensure the matter is adequately dealt with				

Reference	41 Mrs	Stanley	Ainsworth	-	Number of supporters:
Commenting on	3.3		Housing supply		HS2
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>The emerging plan is not sound with regard to the exclusion of the land to the West of the former Glory public house (now apartments) within the Urban Boundary and for its exclusion for housing purposes when adjoining land to the South and East is to be so treated. See submitted Planning Statement</p> <p>The inclusion of the submitted plan within the Urban Boundary and for housing purposes</p>					
Do you wish to participate to the Examination In Public?	Yes	Reasons	To ensure the matter is fully considered		

Reference	58 Mr	Alex	Marsh		Number of supporters:
Commenting on	-		-		HS2
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	No
<p>The plan is unsound, because it has taken no account of the public health issues raised by living within 100 metres of a major road (A56). These issues are plain from several studies in a number of countries. Pollution from road traffic is implicated in increased death rates, and also in poor health of the residents of housing in close proximity to major routes. Asthma, emphysema, bronchitis, COPD and similar life-affecting conditions are aggravated and triggered by the nitrogen oxides emitted by vehicles, and by exhaust emissions, brake dust and tyre dust which contribute to PM10, PM5 and PM 2.5 particulate matter - known to be injurious to the health of people exposed to them. Children exposed to these pollutants potentially suffer most, because of their longer exposure and immature physiology. The noise level is a contributory factor in the development of stress conditions and Alzheimer's disease. The A56 runs roughly North and South. The prevailing wind is typically from the West and South-west. This suggests that the pollution from the A56 will be blown over the entire area in which it is proposed that houses should be built - on the East side of the road. The majority of this area is within 100 metres of the A56 and therefore suffers significant exposure of the type reported in several studies. Sources: Daily Telegraph 4 January 2017 Science Editor San Diego UrbDezine sandiego.urbdezine.com 28 May 2015 The Guardian 26 January 2007 Health Correspondent DEFRA report Nitrogen Dioxide fall off with distance laqm.defra.gov.uk The Independent 3 August 2017 Motorways could be covered with large tunnels American Lung Association 10 April 2018 lung.com Living near highways and Air Pollution Royal College of Physicians 23 February 2016 Every breath we take: the lifelong impact of air pollution Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution. The diseases which precede these deaths have a high cost for the people who suffer them, and a consequent cost to the NHS, estimated at £20 billion every year. The proposal to build houses in the areas detailed in the Rossendale plan apparently ignores the above considerations and is therefore unsound.</p> <p>To justify the passing of the proposals, I believe that Lancashire Council has a duty to demonstrate that the conclusions of the reports cited above in this objection are substantially untrue. One way to demonstrate the soundness of the proposed development, is to conduct a survey of health within the Rossendale area, focussing on the conditions mentioned above. Plotting the incidence of these conditions on a map of the borough would indicate where they are most prevalent. According to the various studies it is likely that the "hotspots" will be close to the major routes through the borough. Proceeding with the proposals, in the face of such evidence would be foolhardy and reflect poorly on the local authority, Lancashire County Council and the national government who are trying to force local authorities to build in places that are unsuitable.</p>					
Do you wish to participate to the Examination In Public?	No	Reasons	-		

Reference **76 Mr Harry Dutton** - Number of supporters:

Commenting on - SD2 HS6 ENV3 HS2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir/Madam.We would like to make the following representations regarding the soundness of the proposed Local Plan Reg 19.Strategic Policy SD2 states that all new developments will take place within the Urban Boundary except where development specifically needs to be located within a countryside location and the development ENHANCES the rural character of the area. The vast majority of housing sites proposed in the two Bacup wards of Greensclough and Irwell are on Greenfield sites outside the Urban Boundary. Policy ENV3 Landscape Character and Quality, states that pastures enclosed by dry stone walls will be protected and enhanced. The sites proposed in Greensclough ward exactly fit this description. Policy S6 requires that 30% of all housing developments must be affordable housing. The development of 30 houses presently taking place at Greensnook Lane, Greensclough Ward on an extremely attractive site has had its requirement for affordable housing waived due to the market value. If this site in a desirable location is deemed to be unviable if affordable homes were to be included, the proposed sites in Greensclough which are all in less advantageous areas, many with unfavourable access, will consequently fall into this category and therefore there will be no affordable houses built. The proposals to build almost 1000 houses in the Bacup area at the furthest point from the Motorway network at Rawtenstall will exacerbate the existing inadequate infrastructure causing further congestion. Recently Bacup Road has been declared an AQM area due to the high levels of nitrous oxide, the inevitable increase in traffic can only add to pollution on this road. It is for the above reasons that we believe the plans as they relate to this area are unsound and contradict many of the policies contained in the plan. We urge you to reject the current proposals in favour of a more sustainable plan in keeping with the rural nature of the area.

All housing developments should be located within the existing Urban Boundary. There should be a reduction in the amount of housing in the Greensnook and Irwell Wards in the interests of sustainability.

Do you wish to participate to the Examination In Public? **Yes** Reasons **Because I have grave concerns that if the proposals are adopted in their present form they will have a detrimental effect on the quality of life of local residents. I also feel that the Inspector should hear from local people.**

Reference **79 Mr P Ramsden Linden Park Developments Ltd** Number of supporters:

Commenting on - Policy HS2 HS2

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

This policy identifies a number of sites on the Policies Map that have been allocated for housing development. The Representor does not object to the intent and purpose of the policy but it does question why a site off Lindon Park Road, Ewood Bridge, Haslingden is not included. This site was granted outline planning permission for 235 dwellings in 1972 (under planning permission ref no. 13/2/2600LA). Subsequently, a further detailed planning permission was granted for 231 dwellings at the site (under planning permission ref no. 13/2/2758) albeit the extent of the application site was slightly smaller than the area covered under planning permission ref no. 13/2/2600LA. In or around 1974, 44 of the consent dwellings under planning permission 13/2/2758 were constructed and later sold and occupied. As a consequence of the fact that the relevant detailed planning permission has been implemented, as evidenced by the fact that 44 of the permitted dwellings were built and stand and remain occupied today, confirms that the other non-implemented elements of the permission can be built out in future. The owners of the site, the Representors in this instance, have sought learned counsel's opinion on this matter, which was provided to a prospective housebuilder in 2013, which concludes the same. As such, this site, for which we would be happy to provide further details and background information and documentation on, should be included in the schedule introduced by this policy as a residential allocation for up to 187 dwellings (number not yet built out under planning permission ref no. 13/2/2758) or another number to be defined through a fresh planning permission. The fact that this site benefits from a planning permission for residential development raises the question about whether all of the sites forming part of Policy HS2 need to be retained. In the Representor's view, a number of sites currently included in the policy are not obvious development sites by reference to site and other related constraints. For example (in no particular order): HS2.82, HS2.84, HS2.24, HS2.33, HS2.53, HS2.80, HS2.32, HS2.24, all of which raise different issues regarding whether they are suitable and viable for development of housing and within the plan period, a key issue being that many would seriously impact on existing urban areas and cause urban cramming by virtue of the fact that no new infrastructure is planned to cope with the additional development. Indeed, the Representor is of the view that the Council should give serious consideration to adopting a new and more sustainable development strategy which involves releasing Green Belt in the southern section of the district so that new development has better access to the primary route network, public transport and main centres both in and out of the borough. Regardless of this preferred strategy, the Representor is of the view that all of the sites currently proposed to be allocated need to be fully and properly reviewed to ascertain their suitability for development, and linked to this the Council should consider formulating an infrastructure masterplan to ensure that with all of the planned development in place, the urban areas of the borough can still operate effectively and sustainably. It also needs to carry out a full and proper audit to ensure that sites like the Representor's are not missed or ignored, given the significant role they might be able to play in housing delivery.

The Representor proposes a change of designation of their site off Lindon Park Road from Green Belt to Housing, which could reduce the pressure on urban areas and their infrastructure and reduce the overall amount of greenfield land which must be allocated for development. Such a change in allocation would be suitable given the extant planning permission for housing which exists on the site and would be particularly useful in meeting housing targets, given the borough's history of poor delivery rates due to lack of suitable, viable and available development sites.

Do you wish to participate to the Examination In Public? **Yes** Reasons In order to purvey the above representation in a professional manner, resulting in the best possible outcome for our client.

Reference	94 Mrs	L	Bower	-	Number of supporters:
Commenting on	-		HS1 and Appendix 4		HS2
Is the Local Plan legally compliant?	No		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? No
<p>4.1 Objection to Policy HS1 and Appendix 4 (Housing Trajectory) 4.1.1 Setting our objections to the figure of 212 dwellings per annum to one side, we have significant concerns as to whether the plan would provide sufficient land to meet the planned requirement. 4.2 Policy HS1 proposes at least 3,180 additional dwellings over the plan period. However the Housing Trajectory in Appendix 4 of the plan proposed to deliver 2,809 dwellings between 2019 and 2034 on allocated sites. This is some 371 dwellings short of the minimum requirement. No other sources of supply are set out in the trajectory which would be expected. There is also no other sources identified in the SHLAA or other parts of the evidence base. 4.3 The 2017 Housing Supply Statement sets out a supply of 2.4 years to 2.6 years. This is based on a deliverable supply of 985 dwellings comprising of: • Dwellings under construction 436; • Dwellings with planning permission 261; • Dwellings with resolution to grant permission 256; and, • Small sites allowance 32.4 This is at a base date of April 2017 which is 2 year prior to the start of the plan period so these sources cannot simply be carried forward. 4.5 It is clear that based on the Housing Trajectory in Appendix 4 that the proposed requirement will need to be met through additional omission sites. This is based on all the sites in the trajectory delivering. If any sites are removed from the plan, or if the projected supply from allocated sites is reduced, then further land will be required. 4.6 We consider that this clearly provides insufficient flexibility to respond to changing circumstances, i.e. slippage in the delivery of housing from strategic sites, as required by the Framework. 4.7 The Local Plans Expert Group published its report to the Communities Secretary and to the Minister of Housing and Planning in March 2016. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework. Reserve Sites represent land that can be brought forward to respond to changes in circumstances. 4.8 These conclusions reflect precisely the concerns that we have in respect of the draft Plan. There is insufficient flexibility to deal with changing circumstances, specifically a failure to deliver housing at the anticipated rates. At present there is not sufficient sites allocated and any slippage from the identified sites would result in an even greater shortfall against the housing requirement. This would have serious implications in terms of the failure to meet identified housing need. 4.9 We consider that a much higher flexibility allowance is required, in the order of 20% as advised in the Local Plans Expert Group. This would give a reasonable degree of security that should sites not deliver at the rates anticipated, a 5 year housing land supply could still be maintained. 4.10 The housing trajectory sets out the expected delivery rates for each year of the plan period. The Council’s position is that the plan requirement can be met and a 5 year supply demonstrated at the point of adoption. We make the following points. Lead in times and Build Rates 4.11 Section 6.5 of the SHLAA states: “For sites that are deliverable and developable the lead-in time and build out rates will be assessed using information from the delivery of previous sites in the Borough and from information submitted by developers. A lead in time of 2 years is generally considered for the land acquisition, submission of planning application and submission of discharge of conditions. An average build out rate of 20 dwellings per year is used to allow for the difference of build out rates between high value market area and low value market area.” 4.12 The lead in times used are very basic and do not taken account of other considerations. For example some sites will be controlled by developers, others will not, some will be subject to planning applications or permissions and others will not. Therefore it is necessary to look at each site, consider its planning status, whom it is controlled by and then make a judgement on when first completions are expected. In summary, our assessment shows that sites without planning permission are likely to take materially longer for the following reasons. • The assumptions made fail to take into account how long it takes for outline/full/reserved matters applications to be prepared, submitted and granted. For example in the Council’s latest lead-in times, there is no difference between the lead in time for those sites with outline planning permission and those with full planning permission. Consequently, it is recommended that the lead-in times are set out for outline applications, reserved matters and full applications. • Sites without planning permission – lead-in times must reflect the need for: • Marketing; • Preparation of an application and the necessary surveys and assessments; • Whether permission will be granted; • The preparation of masterplans (a requirement of Policy HS2 and not referred to in the SHLAA); • the preparation of the planning application and supporting documents; • The discharge of pre-commencement conditions; • Construction start up and infrastructure 4.13 An average build rate of 20 dwellings per annum is applied. However the housing trajectory applies higher build out</p>					

rates for certain sites. This conflicts with the evidence base and the average of 20 dwellings per annum should be used.

Additional housing sites are required to be allocated.

Do you wish to participate to the Examination In Public? **Yes**

Reasons Our objection raises significant issues with the supply of housing and insufficient sites to meet the figure in Policy HS1

Reference	101 c/o Agent	c/o Agent	c/o/ Agent	The Methodist Church	Number of supporters:
Commenting on	-		HS2	HS2	
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate? Did not answer
Please see attached Representations by Nexus Planning (including Development Statement and Illustrative Masterplan in relation to Site H72)					

5.0 Policy HS2: Housing Site Allocations

5.1 For the reasons set out in our representations to Policy HS3, the Methodist Church support the proposed allocation H72: Land West of Market Street under Policy HS2.

5.2 It is considered that the Church’s part of the site (referred to as ‘land off Exchange Street’) is capable of accommodating around 90 dwellings, and has the potential to come forward as the first phase of the wider allocation with a realistic prospect that housing can be delivered on the site within the next 5 years.

Please see attached Representations by Nexus Planning (including Development Statement and Illustrative Masterplan in relation to Site H72)

Do you wish to participate to the Examination In Public? **Yes**

Reasons As landowners of part of 'Major Site' H72: Land West of Market Street, the Methodist Church consider it is important to have the opportunity to participate in the examination in support of the allocation of the site.

Reference	106 Ms	Rachael	Gildert	-	Number of supporters:
Commenting on	-		-	HS2	
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Yes
There has been no consultation with local residents as to the housing sites put forward in the Loveclough area; they have come as a surprise to local residents since the previous documents					

Reconsider the proposals and engage with the community

Do you wish to participate to the Examination In Public? **No**

Reasons -

Reference	107 Mrs S	Downham	-	Number of supporters:
Commenting on	3	Land availability	HS2	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Did not answer

Plases see submitted Planning statement (Please see appendix)

Site to be included for housing purposes within the redefined Urban Boundary

Do you wish to participate to the Examination In Public?	Yes	Reasons	so that representations can be made
Reference	108 Mrs Joan	Glanfield	-
Commenting on	-	HS2	HS2
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	Did not answer

I have received notification from Jake Berry that he has got the number of houses Rossendale Council are being required to build DOWN to 2000. This means that you will not need to use all the greenfield sites that you have earmarked for development. I assume that fact will be shown in a revised version of your local plan. The government also announced that councils can bid for money to build new Council Houses. How many of the new revised figures will be Council Houses. Jake Berry must have informed you about this long before he informed us. Why has there been no information, announcement in the Free Press.

My objections to the local plan are the same as they were for the last one and the one before that. There will be at least 7000 extra cars on the roads of an area that has just become the most congested outside the 3 big cities of London, Birmingham + Manchester, where are the roads to cope with this. There are not enough nurseries, infant, junior or senior schools to put children in. children already living her can't get a place at the schools in the valley. Health services are already over stretched, air pollution is going to get worse. Waiting lists now are already full. Waiting times for appointments are getting longer + longer. No plans as far as I could see for building new surgeries. Health is important, where are the leisure facilities, you have shut most of what we had down and what's left have waiting lists what about, people with special needs, the disabled, people with mental health issues. You closed the one place they could go too and there's nothing in these plans about them. You say builders will be putting affordable housing in. there hasn't been a builder in this valley since 1970 that has kept their promise + put affordable houses here. I call affordable houses, £60,000 - £100,000. They call affordable housing in the £250,000 bracket + rising. The houses you are proposing are meant for people from outside the valley on big wages. You said you would build on brownfield sites before green field. 46 greenfield sites only 25 brown + 5 mixed. You are taking nearly every greenfield you can find because it is easier and cheaper to build on them. Why in this plan didn't you listen to local people who told you they didn't want a new bus station. You could have left the bus station where it is. Turned the Old Town Hall into a hotel and built some flats on the square in Rawtenstall, that would have saved a few greenfields. Why haven't you gone back to government and got them to reduce further the number of houses to be built here. You cant move at times in this valley and it's only going to get worse. I sent you a list of brownfield sites, have you been out of your offices to look for more.

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Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	109 Ms	Susan	Riley	-	Number of supporters:
Commenting on	3		Land availability		HS2
Is the Local Plan legally compliant?	Did not answer		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Did not answer

See submitted Planning Statement (Please see appendix)

The inclusion of the site as shown in SHLAA 2018 no SHLAA18305 within the Urban Boiundary and allocated for housing development

Do you wish to participate to the Examination In Public? **Yes** Reasons For the consideration of the process and the site

Reference	115 Mr	Jordan	Collier	-	Number of supporters:
Commenting on	-		-		HS2
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? No

There are three housing sites identified for Whitworth, namely H65, H68 & H69 as identified on the policies map. The local infrastructure is already struggling with the current volume of housing. These proposals do not include any intention to deal with: the lack of local school places, to deal with the additional traffic on our already over congested roads or the lack of available doctors appointments. How can such plans be passed without a predetermined solution for these inevitable issues?

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	118 Mr	Michael	Whitworth	Manchester Museum	Number of supporters:
Commenting on	-		-		HS2
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? No

The building plans for Whitworth fail to take account of its geography and its unsuitability to develop a sufficient infrastructure to expand further. Whitworth is a narrow valley with a single road in and out. The fact it is wedged in a valley makes development of extra capacity roads impossible and services such as schools and doctors are already heavily over subscribed. The high school is already forced to turn local children away while a seriously over subscribed doctors is seriously at a limit. There is no space to expand the single road in and out that already causes chaos when there is any road works on it. It appears to me that the planners wanting more housing on an already overdeveloped narrow valley obviously haven't spent time in it or researched its problematical location for any sensible development opportunities.

Do you wish to participate to the Examination In Public? **Yes** Reasons Planners seem to have no local knowledge

Reference **122 Mrs Uma Cutting**

Number of supporters:

Commenting on

HS2

HS2

Is the Local Plan legally compliant? **No**

Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **No**

"I'm reiterating my views on the governments plan to insist we find space to accommodate more housing within the valley. The valley does not have the infrastructure to accommodate continuous house building. The roads are limited and the town would be far more congested than it is already. Has the government ever thought about changing the rules and regulations for private landowners who purchase land speculatively. Because of this more pressure is applied upon the community to sacrifice the look and feel of their town. More pressure is then applied to use up green field and green belt sites to accommodate the greed of selfish private landowners. There are plenty of old mills and buildings within the valley that could be used as flats! If there has to be future building in the valley then why can the infrastructure not be put in place first to then accommodate the governments NEED for more housing. I don't believe that there is a need where we live, perhaps down south maybe, but not in the valley. It's just a tick box exercise to allow the government to say they have built so many thousands of extra homes to secure their party's position. Sadly places like the valley are used as political pawns just to satisfy ridiculous party politics. No one seems to want to look at the bigger picture. It's all about point scoring. The people of Rossendale have very little faith in the council who are always accused of doing 'back hand' deals and sacrificing the look and future of the valley instead of preserving the beautiful town that we live in. The only people that will ultimately benefit are the builders who will make yet more money and they won't be living in squeezed houses that's overlooked in every direction!!"

Received 05/10/18:

Dear Sirs,

Re: ROSSENDALE DRAFT LOCAL PLAN PROPOSALS, Regulation 19 Consultation

H4 Turton Hollow Goodshaw (30 houses); 5 Swinshaw Hall, Loveclough (47 houses)

H13 Loveclough WMC and land at rear (95 houses); 17 Land south of Goodshawfold Road (houses)

I write with reference to the Local Plan proposals. As a resident, I know the area well and wish to register my objection to the proposals on the following grounds.

Whilst I am aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and Council Tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council's previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. The council has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lies outside the council's current urban boundary. Two Government Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would be a complete U-turn on this undertaking and, frankly, a betrayal of residents

Secondly, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. The destruction of amenity will be profound and will encourage speculative applications in the future.

Thirdly, the road network cannot support the additional volume of traffic. The A682 - Burnley Road - is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional 360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 360 cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally the existing traffic bottleneck in Rawtenstall with an additional 700+ vehicles will be intensified. .

Fourthly, the local primary school is already full and there are no published plans for it to expand it to accommodate an additional estimated 400 pupils. Should the school be enlarged, it would become of an educational unacceptable size as a result having to almost double in size.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure and this will only increase if

the proposals are given the go-ahead. The increased pressure on medical and dental provision would be extreme with an additional 800 residents' need to be catered for. Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. Once permission has been granted for the western sites, Rossendale Borough is likely to be inundated with applications to build on land from the Boundary Garage to Crawshawbooth. Given that permission would have to be granted if these proposals are adopted and implemented, the Borough would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty. I urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability and take steps to prevent what would almost certainly be a developmental and environmental disaster by reconsidering the proposal H13 together with H17, H4 and H5.

Just a few additional points that I would like to make.

- 1) The decision to build 5000 new homes in the borough, bringing about 10,000 more cars onto a town that was recently declared to be the most congested town in the UK. Can you explain how the valley will be able to manage such volume of traffic and exactly what infrastructure will be in place to alleviate any additional congestion.
- 2) There was an article in the Daily Mail which confirmed that traffic pollution contributes towards Alzheimers. Has health benefits of the additional housing been factored into account?
- 3) The valley isn't design sadly for additional housing because of the decisions made in the past that has now made commuting through the valley extremely difficult. Burnley road has one road in and one road out. Other roads in the valley are much the same. How can a valley that isn't functional how additional housing going to cope with the new intake
- 4) Explain which schools / GPs / Dentists will be able to accommodate this?
- 5) If we have a recession, how will unemployment effect the valley with new housing?
- 6) Where is the demand for new housing in the valley?
- 7) How will transport play a part in this. Surely it would make sense to put in place a train station to ease motorway congestion instead of increasing congestion on the roads.
- 8) How much thought has been given to maintaining the beauty of the valley which is going to be mined into a housing jungle. How environmentally friendly does the additional housing play where the environment is considered?

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:
Commenting on HS2 HS2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

A. RCT welcomes HS2 and HS7’s return to aims of 2011 Core Strategy density targets, and notes how in 2017:

Table 1: Housing Site Allocations Total Potential Housing Number 3622.....When calculating the potential numbers of housing on each site a density of 30 dwellings per hectare has been used unless more detailed information is available.....

B. RCT’s not seen mention of the 2013-14 Urban and Green Belt Boundary Review required by 2011 Core Strategy in response to developer’s views that there were insufficient good sized well located sites within the present boundaries. That they just happened to own sites outside these boundaries.....

C. RCT object to no reference to “Report to Rossendale Borough Council by Roland Punshon BSc Hons, MRTPI an Inspector appointed by the Secretary of State for Communities and Local Government 10 October 2011”

Appendix D: Monitoring and Implementation Strategy:-

70% of all new residential development in Rawtenstall, Bacup, Haslingden and Whitworth to be built at 50 dwellings per hectare. 85% of all new residential development in all other areas to be built at 30 dwellings per hectare.

D. RCT welcome more logical distribution of Site Allocations, 3622 dwellings in 2017, now 2853 + 4 pitches = 2857:

Rossendale West with good accessibility from M66/A56T – 836, now 797.

Rossendale Central with fair but often congested access from A681 and A682 – 1276, now 909.

Rossendale East with poor and often slow access from A681 and A671 – 1510, now 1151

Note the well used “rat run” along Newchurch Road, was in 2017 proposed to serve an extra 300++ houses, and seen by one RCT Member: my own concerns are less wide-ranging and are chiefly centred on the proposals for the many housing sites on or adjacent to Newchurch Road. Should all these eventually come to fruition there will be a considerable increase in traffic in both directions along along Newchurch Road. This will be most apparent at the west end at the junction with Burnley Road (A682) and at the east end for those leaving Turnpike at the awkward junction with the B6283. The access and exit from Union Street, in Rawtenstall, already problematic, will inexorably become more difficult as Union Street is the only access to properties on Union Street, Green Street, Rose Bank, Hurst Lane, Hurst Crescent And Waingate Village. We have written to RBC (& LCC) on this matter several times over the years our representations seem to fall on deaf ears. They just don't seem to care but the situation will become intolerable if all these sites are made available for housing.

E. RCT object to lack of a policy for council owned land to retain its original purpose, kept for future generation’s needs, and if proposed for housing, it should be offered on tender to RSL’s. And given the often poor quality of unbuilt on land, there should be at least some trial holes to check its nature, stability and wetness before any changes of use are proposed.

F. RCT in conclusion welcome 2018’s changes to HS2: for meeting national needs: Fixing Our Broken Housing Market, Department for Communities and Local Government (February 2017). Its section on housing density that does not quite fit with 30/Ha, often delivered and still desired by too many house builders.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5032 Dr	David	Hempsall	Limey Valley Resident Association	Number of supporters:
Commenting on		HS2		HS2	
Is the Local Plan legally compliant?	No		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Did not answer

Representation received 18/09/2018 (Annex A):

The association appreciates that Rossendale Borough Council and its planners are caught between a rock and a hard place. On the one hand, there is central government making its demands for strategic planning on local authorities. On the other are the interests and concerns of those residents - and council tax payers - who will be affected, usually adversely, by what is proposed. This is the present situation as what is proposed for LVRA's area of operation has appeared at what is effectively one minute to midnight. That this is so is wholly unsatisfactory.

At this, the Publication (Regulation 19) stage of the evolving Local Plan, residents' ability to respond is constrained by three criteria: Soundness, Legal and Duty to Cooperate. On Soundness, there has been a manifest failure to consult those residents most affected by the last-minute additions – for that is what they are – to the proposed Local Plan. This smacks either of desperation or, more sinisterly, of a deliberate concealment of plans which only now have been sprung upon residents. On this occasion, the association hopes that it is the former, not the latter, which applies.

The failure to consult is demonstrable and has the effect of vitiating the plan so far as it applies in our area. Locals are far better placed than any to comment on the appropriateness (or otherwise) of particular sites, having a knowledge of the topography and attendant issues which elude even the most conscientious planners. On Legal, the failure to consult on these proposals until this stage is manifestly contrary to natural justice. Whilst collectively the association has no legal expertise, it is legitimate to ask whether or not Rossendale Borough Council has truly followed its own procedures before foisting on residents these last-ditch proposals?

As RBC has failed previously to consult on these proposals, the association is justified in making reference to the specifics of the four sites which are of most concern. They are as follows: H4 Turton Hollow Goodshaw (30 houses); H5 Swinshaw Hall, Loveclough (47 houses); H13 Loveclough WMC and land at rear (95 houses); H17 Land south of Goodshawfold Road (7 houses). As residents, we know the area well and wish to register our objections and, in a couple of instances, proffering constructive criticism which LVRA hopes will be helpful.

Whilst we are aware of Rossendale Borough Council's commitment to providing 3180 new houses over the next 15 years as required by central government, the proposal for land availability in Goodshaw Ward as stated above is inappropriate, excessive, ill-advised and, to existing residents and council tax payers, unacceptable.

First, what is proposed conflicts with Rossendale Borough Council (RBC)'s previously adopted Core Strategy, arrived at in 2011 after consultation with residents' representatives. Since 2009, RBC has repeatedly given an undertaking that there will be no new developments west of the Burnley Road (A682) in this area. The sites in question are designated as countryside and lie outside the council's current urban boundary. Two Planning Inspectors have supported this undertaking in recent times, in 2015 and again only last year, 2017. Approval of H13, and H17, a total of 102 houses would mark a complete U-turn on this undertaking and, frankly, a betrayal of residents.

Here, it would have been beneficial for RBC and its planners to consult local residents whose knowledge of their environment is second to none. One of our number has made a detailed study of H13. By careful measurement, he has concluded that what is planned for the site (which lies to the west of the Burnley Road) could equally as well be situated on the site shown in the accompanying map – Annex 1 - which lies to the east. He has identified other options on the east side of the A682 which he will be happy to share.

Doing so would allow RBC to maintain its undertaking not to develop on the west side with honour. Indeed, the alternative shown is larger than H13, thereby allowing some additional housing to help meet RBC's remaining shortfall. Moreover, the site includes the additional benefit of existing road access.

Secondly, whilst the previous suggestion helps RBC achieve its target, the sheer number of properties proposed in areas H4, H5, H13 and H17 (179 houses) is simply excessive. It amounts to an additional Badgercote plus Penny Lodge and is disproportionate. The destruction of amenity will be profound and will encourage speculative applications in the future. Furthermore locating a large development at H5 will seriously affect the setting of Swinshaw Hall, a historic building and H13 - an overwhelming development - is located between the two conservation areas of Goodshawfold and Loveclough Fold. Both developments are particularly ill-advised.

Again, local wisdom may be instructive. H5 and H13 are both sloping, ill-drained sites. The topography is self-evident; the land is sour as the presence of tussocks proves. With

respect, recent past development of such sites which are sodden with run-off is discouraging. At Badgercote, for example, there is an on-going problem of properties' basements being inundated by run-off, especially in the inclement weather which is so frequent. The reason is clear. The construction company was McDermotts and its planners had neither interest in, nor knowledge of the existing land drain network. As it happens, McDermotts have very recently built a new development at Brown Leaves in the Ribble Valley. On what is a flat site, a number of the properties are affected by wholly inadequate drainage, producing sodden ground which feeble attempts at remediation have failed to solve. The association is fearful that similar such developers may be allowed to move into its area of operation. Given RBC's frankly limp-wristed approach when dealing with developer malfeasance, residents can have no confidence that control will be properly exercised.

Thirdly, all discussion of a proposed rail link south from Rawtenstall is irrelevant. The road network simply cannot support the additional volume of traffic. The A682 – Burnley Road – is already a very busy main road linking Burnley and Rawtenstall and the addition of further traffic has both environmental and safety implications. The proposals suggest that an additional ±360 vehicles will use this road daily mainly travelling towards Rawtenstall. This would be in addition to the estimated 300+ cars from the proposed new housing at The Hollins (H11, 70 houses) and Reedsholme Works (H12, 100 houses). Furthermore the geography of the area prevents any upgrading of the A682 to a suitable standard. Additionally, the existing traffic bottleneck in Rawtenstall with an additional ±700 vehicles will be intensified. This is reinforced by the observation made very recently by an officer of RBC that “solving Rossendale's traffic problems is impossible”.

It is both ironic (and timely) that the front-page headline of the Rossendale Free Press this very week reads: “We've got the worst traffic in the country”. The accompanying story on page 5 retails the National Infrastructure Commission's report which asserts that, outside Britain's cities, Rossendale has the worst traffic problems in the country (Annex 2). Whilst this brooks no contradiction and merely underlines the daily misery endured by residents commuting both north and south, the proposal to add to the problem as outlined in RBC's proposals is rendered risible.

Fourthly, the local primary school is already full and there are no published plans for it to expand to accommodate an additional estimated ±300 pupils. It came as news to the LVRA that, after years of rejecting any expansion, the current head teacher is now agreeable to the school's enlargement. The LVRA has on its strength a number of people with enormous experience in the educational sector, including a retired school inspector. It is their judgment that any enlargement of the school as may be required is simply not feasible on its present cramped site. What is effectively a doubling in size is educationally unsound.

Fifthly, there will be increased pressure and demand on the existing overburdened infrastructure. The sewerage system is already under pressure (not least from discharges of animal blood and viscera from an abattoir to the north lying outside the borough which, we are advised, is a matter of prosecution) and this will only increase if the proposals are given the go-ahead. The increased demand on medical and dental provision will be extreme with an additional 7-800 residents' need to be catered for. Given, for example, the difficulty which the St James practice has in attracting permanent members of staff, the association feels that the frankly third-rate service provided there will decline further to Third World standard.

Finally, interest shown in acquiring land in the vicinity of Loveclough has been high. It is self-evident that this will be top of any developer's wish-list and allowing building to proceed in the timeframe RBC has adopted will turn Loveclough into a building site for five years, making residents' lives intolerable. Moreover, once permission has been granted for the western sites, Rossendale Borough is certain to be inundated with applications to build on land from Boundary Garage to Crawshawbooth, the area being more attractive to developers than, say, Bacup. Given that permission would have to be granted if these proposals are adopted and implemented, RBC would have no grounds for refusing applications and thus allowing wholesale development in an area of considerable natural beauty.

We urge Rossendale Borough Council to take all the above into account when reaching a final decision on housing land availability. In fine, LVRA's objections are reducible to two. First, the land allocated is inappropriate for the reasons set out above: implementation will produce a developmental and environmental disaster. Secondly, the association is frankly appalled by the way in which the proposals have been belatedly foisted on unsuspecting residents without due process, thereby reducing to almost nil their ability to respond.

Annex 1

Annex 2

“Manchester suffers the worst congestion of anywhere outside London, according to a new league table released today by the National Infrastructure Commission.

While the capital still sees more traffic congestion than any other area of the country, Manchester tops the league outside London, with Liverpool second and Birmingham in third place.

Rounding off the top 10 are cities from across England – one is in Yorkshire, two are in the East Midlands, while a further two cities are in the South West, and two spots are filled by cities in the wider South East.

In fact, the first area of the country to appear on the league table that is not a city is the area of Accrington and Rossendale – appearing at number 26. All other spots above that are filled by cities.”

Source: National Infrastructure Commission, National Infrastructure Assessment, 08 September 2018; based on research evidence presented to the NIC and published as Prospective: Transport connectivity report, 25 June 2018.

Representation received 01/10/2018:

As one of the architects of the collective response of the Limey Valley Residents Association (LVRA), I wish simply to reiterate the points made in that document, attached here as Annex A.

Whilst this is necessarily concise, being a summation of responses received from residents, the fact is that the Rossendale Draft Local Plan, Pre-Submission Publication Version, Regulation 19 Consultation document is, in many respects, tendentious. Let me give an example. On HS4 – the development to the south and east of Loveclough Social Club and Commercial Street – the document (known hereafter as RDLP Reg 19) states: “The site slopes westwards and is accessible via Burnley Road. The area is very open in character and provides long views to the west part of the Valley from Burnley Road. As such development of the site will require suitable mitigation to ensure that the development does not have a significant landscape impact. “ (RDLP Reg 19, p. 27).

With respect, the statement is impossible of achievement. My own viewing of the site from the A682 Burnley Road demonstrates that, objectively, far from having “no significant landscape impact”, any development will be clearly visible. There are two reasons for this. First, the high visibility of existing terraced homes on the south side of Commercial Street gives the lie to the proposition: no one could ever claim that these have no significant landscape impact. Secondly, the report takes no account at all of the “long view” looking east from those homes on the west, Hameldon side of the valley. If the plan is to be implemented “as is”, then those residents will look across to new, sprawling settlement with such gaps as remain on the north-south axis under further threat of ribbon development. This simply cannot be construed as “no significant landscape impact”.

Whilst this is but one example of RDLP Reg 19’s many subjectivities – aspirational perhaps, but impossible of delivery - I have to comment on the conduct of the present consultation which compels residents who have never previously seen what is being proposed to address Regulation 19 criteria: Soundness, Legal and Duty to Cooperate.

Whilst the flaws in RBC’s proposals are covered broadly in LVRA’s formal response, inter alia, the association makes the following observation on the manifest failure to consult residents: [this] smacks either of desperation or, more sinisterly, of a deliberate concealment of plans which only now have been sprung upon residents. On this occasion, the association hopes that it is the former, not the latter, which applies.” Subsequent to the LVRA’s sending in its response, facts have emerged which suggest very strongly that, sadly, that the council has been underhand (or, more charitably, incompetent) in its dealings.

Before enumerating some of these, let me suggest that the best way of getting public attention would have been by a simple, inexpensive mail-drop. A local resident who is a friend of mine tells me that he and his neighbours received from Lancashire County Council a letter asking them to ensure that they did not litter a public footpath adjacent to their properties. If LCC can communicate very effectively in this way, why did RBC choose not to utilise the same medium, guaranteed at least to reach every resident’s letter-box?

The LVRA’s own experience is that when seeking to inform residents, all available media have to be saturated, both print and web-based. Resorting merely to the Rossendale Free Press or to the web, Facebook and Twitter is not enough. What lies behind the very late and very limited dissemination of information about what is now proposed is open to serious question. Perhaps the LVRA was wrong to dismiss any sinister intent. Deliberately or otherwise, residents have been kept in the dark. For first light to be shed at the Regulation 19 stage is simply not on.

I shall not dwell further on the last-minute nature of the present consultation. The fact remains that the proposals have been rushed out in such a way that precludes residents' full and proper input. This is not just disappointing; it is frankly appalling. The proverbial "man on the Clapham omnibus" would conclude that the procedure to date has been contrary to natural justice.

So, what of the specific issues?

First, the Regulation 19 consultation has been conducted very largely on-line. The association's experience of those living on its patch is that about 40% have no on-line access, not because they are technophobes but because they simply do not possess the kit. There is an arrogance in assuming that referring residents to web-based material is sufficient. Secondly, RBC invited residents to view the relevant documentation at its offices at Futures Park. Given that these are situated in Bacup, this is inconvenient – not to say very difficult – for those living in the association's area of operation. That two so-called information events on 13 and 18 September were also staged at Futures Park smacks of the same conceit.

Thirdly, a visit to Crawshawbooth Library by an association officer on 19 September, visiting for reasons of business, unearthed the gem that RBC documentation relating to the consultation had been deposited at the village library for some little while. The library's hours of opening are very, very limited; but, once again, no information about the availability of the documentation had been circulated. The discovery that it was was one made by pure chance. Again, the rhetorical question: if the material was to be made available locally, why were local residents not told so?

I could continue. I won't. I shall simply say that RBC's broadcasting so late in the day of proposals which will have a devastating effect on the life and environment of those resident on the LVRA's patch is a model of "how not to do it". The proposals themselves are so poorly conceived as to betray both haste and desperation, imposed on residents using a device – Regulation 19 – which, having omitted completely full and proper consultation at an earlier stage, is procedurally neither fair nor reasonable. The LVRA questions whether RBC has followed its own procedures in this matter. Residents' learning for the first time of what RBC proposes at the Regulation 19 stage of developments is plain wrong.

In fine, are the proposals Sound? The LVRA response makes it plain that they are unsound. I won't repeat the facts detailed there. Is it Legal? It is my contention – as per my preceding paragraph – that telling residents of what is to be visited upon them at the Regulation 19 stage is procedurally questionable and morally indefensible: too many earlier hurdles in his particular race have been cut out. And what of the Duty to Cooperate? Whilst I appreciate that this applies principally to cooperation with other local authorities, cooperation with residents cannot simply be excised from the overall equation.

In closing, let me make a radical suggestion. When planning the likes of Welwyn Garden City and Milton Keynes, it was decided to put in infrastructure first; then develop the so-called "new towns". Of course, RBC has also to consider what already is in terms of settlement; but would it not make sense to address issues of infrastructure – especially the already dreadful road network (dreadful in terms of both connectivity and structural repair) and educational and medical provision – first, before imposing additional strain? Otherwise the considerable difficulties which RBC already has will be compounded. RBC is always playing catch-up and, almost invariably, failing.

Yours faithfully,

Footnote

A recent investigation by the BBC suggested that, on average nationally, 1m2 of agricultural land sells for about £2.00. With planning permission, the same 1m2 can sell for £600.00. A three hundred-fold increase should give councillors sitting on Development Control Committees pause for thought: how they can, by a simple vote, enrich land-owners to this extent.

HARD COPY FOLLOWS BY POST

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5139 Mr****Teague**

Number of supporters:

Commenting on

HS2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Rossendale Borough Council – Draft Local Plan (Regulation 18) Consultation
Submission on behalf of Mr N Teague (Land at Elm Street, Edenfield)

1. INTRODUCTION

BRIEF 1.1 Hourigan Connolly is instructed by Mr N Teague in respect of his land interests at Elm Street, Edenfield. 1.2 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. Following the adoption of the Local Plan Part 1: Core Strategy in November 2011, RBC commenced work on its Local Plan Part 2: Site Allocations and Development Management Policies. However, this document was halted in favour of the preparation of a full new Local Plan which has now been issued for consultation from Monday 24 July to Monday 9 October 2017. This edition of the Local Plan comprises the Regulation 18 consultation document which sets out the Council's preferred approach to future housing, employment and leisure uses over the Plan period. Once adopted the Local Plan will replace the Core Strategy (2011).

1.3 Within the draft Local Plan, sites have been proposed for development (for housing or employment use), for environmental protection and for recreation uses, as identified on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered. 1.4 Documents included in the Draft Local Plan Consultation are the Draft Local Plan (Written Statement), the accompanying Policies Map (including the 6 area maps) and the Infrastructure Delivery Plan. 1.5 The evidence base which supports the Local Plan comprises the following documents: • Strategic Housing Land Availability Assessment (SHLAA) (2017). • Strategic Housing Market Assessment (SHMA) (2017). • Employment Land Review (2017). • Green Belt Review (2016). • Environmental Network Study (2017). • Gypsies and Travellers Accommodation Assessment (2016). • Town Centre, Retail, Leisure and Tourism Study (2017). • Playing Pitch Strategy (2016) (previously published). • Strategic Flood Risk Assessment (SFRA) (2016). • Local Plan Viability Study 2015 and Updated Viability Study in relation to Affordable Housing (2017). • Landscape Study (2015) (previously published). • Landscape capacity study for wind energy developments in the South Pennines (2014) (previously published). • Heritage Impact Assessment of Housing Sites (2017). 1.6 In addition to the above documents, the Council's Sustainability Appraisal, although not strictly evidence, has informed the development of the draft policies.

BACKGROUND

1.7 Hourigan Connolly is instructed to review and comment on the emerging Local Plan in relation to land at Elm Street, Edenfield. The site falls outside of the urban boundary and is designated as Green Belt, and this Representation sets out why the Council should consider amending the urban boundary in this location order to promote sustainable development.

SCOPE

1.8 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

1.9 This representation is structured as follows:

- Legislative and Policy Context.
- The Site.
- Green Belt Review.

- Proposed Extended Employment Allocation.
- Conclusions.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Council's such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The National Planning Policy Framework (hereafter referred to as the Framework) (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people and that Local Planning Authorities should plan for the release of land for development.

FRAMEWORK REQUIREMENTS

2.10 Paragraphs 150 to 185 of the Framework deal with Plan-making.

2.11 The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development. These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by

creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.
- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.
- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159), business (Paragraphs 160 – 161), infrastructure (Paragraph 162) and environment (Paragraphs 165 – 168).

GREEN BELT

2.21 In respect of Green Belt Paragraph 80 of the Framework lists the five national purposes of the Green Belt as follows:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and,
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.22 Paragraph 83 goes on to state that Local Planning Authorities (LPA's) with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or

review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

2.23 Paragraph 84 states when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

2.24 Paragraph 85 sets out that when defining new Green Belt boundaries LPA's should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and

2.25 define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

BUSINESS

2.26 Paragraph 160 of the Framework outlines the importance of local planning authorities having a clear understanding (from a robust evidence base) of business needs within the economic markets operating in and across their area.

2.27 Paragraph 161 of the Framework establishes the importance of understanding business needs (both quantitative and qualitative) and ensuring that sufficient suitable land (both existing and future) is available to meet needs.

HOUSING

2.28 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.29 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- "meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand".

INFRASTRUCTURE

2.30 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.31 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.32 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.33 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.34 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report, in particular paragraph 030 (reference ID: 3-030-20140306 confirms): “Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.35 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306): “WHAT CONSTITUTES A ‘DELIVERABLE SITE’ IN THE CONTEXT OF HOUSING POLICY? Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years. However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe. The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.”

2.36 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that: “HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?”

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.37 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.38 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which have been submitted or will be submitted before 31 March 2018.

2.39 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.40 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

3. THE SITE

SITE LOCATION

3.1 The site's general location is identified below in Figure 3.1.

Figure 3.1 – Land at Elm Street, Edenfield– not to scale.

3.2 The site lies to the south of Elm Street, with properties along Rochdale Road forming the south western boundary and the line of a former hedgerow forming the eastern boundary. This parcel of land forms part of a much larger parcel which is also within the ownership of our client – this wider parcel is bounded by Gincroft Lane, Michael Wife Lane and Plunge Road.

3.3 As is evident from the aerial image above, land at Elm Street has a close physical relationship with the existing built up part of the settlement, and the parcel provides an opportunity for rounding off the urban area.

SITE DESCRIPTION

3.4 The site extends comprises vacant greenfield land currently located within the Green Belt. Adjacent to the site, to the north east, there is a barn which has recently been converted to 2 No. apartments. This is also within the ownership of Mr N Teague and is outlined in red below.

Figure 3.2 – Land at Elm Street, Edenfield.

SURROUNDING AREA

3.5 The subject site is located on the edge of the settlement of Edenfield. The site is approximately 1 mile to the north of Ramsbottom and 2.5 miles south of Rawtenstall. The village is mainly residential in nature and it has seen recent growth as a commuter settlement serving Greater Manchester and Lancashire.

3.6 The village centre is located along Market Street (approximately 150 metres from the site) where a range of local services and facilities can be found, including a baker, butcher, pharmacy, post office newsagent and takeaway.

3.7 The centre of Edenfield lies at the intersection of the A676 providing links to Bolton, the A680 providing links to Accrington and Rochdale and the A56 to Rawtenstall and Bury. The M66 motorway terminates at Edenfield where it becomes the A56 dual carriageway known as the Edenfield Bypass.

3.8 This unremarkable site has a close physical relationship with the existing settlement (being surrounded by development to the north, south and west), and it does not relate to the wider countryside which dominates the landscape further to the east and north. Furthermore, the site is relatively flat compared to other parts of the village and the Borough more widely.

FLOOD RISK

3.9 According to the Flood Map for Planning provided by the Environment Agency, the site lies within Flood Zone 1. Only those areas which lie adjacent to the course of Dearden Clough Brook further to the south are identified as being in Flood Zones 2 and 3.

Figure 3.2 – Extract from Flood Map for Planning

LANDSCAPE

3.10 The Council commissioned a Landscape Character Assessment in 2015. The document separates areas of the Borough into various landscape character types, with reference to those identified in the Lancashire Landscape Strategy. The subject site which is located on the edge of the urban area of Edenfield falls into an area identified as 'Settled Valley'. The area is not identified as one which is of particular value.

Figure 3.3 – Extract from Landscape Character Areas Plan

3.11 The Landscape Character Assessment goes on to assess specific sites in relation to their development potential, although land at Elm Street is not considered in detail in this regard.

PUBLIC RIGHTS OF WAY

3.12 Footpath number 14-3-FP164 runs in close proximity to the site to the south. The wider land which is in the ownership of our client is bounded by further footpaths as shown within Figure 3.4.

Figure 3.4 Extract of Lancashire County Council's PROW Mapping

AGRICULTURAL LAND QUALITY

3.13 According to the agricultural land quality database, land in this area is considered to be of poor or very poor value. This is identified in Figure 3.5 below.

Figure 3.5 Extract of Natural England's Agricultural Land Classification Mapping

ECOLOGY

3.14 The site is not a statutory Ecological or Heritage asset neither is it within 1 km of a National Nature Reserve, Ramsar Site, Site of Special Scientific Interest or Special Protected Area.

SUMMARY

3.15 In summary, none of the statutory or other designations identified would preclude development of the site.

4. GREEN BELT REVIEW

4.1 As part of the evidence base to inform the emerging Local Plan, a Green Belt Review was carried out by LUC with the final report being published in November 2016. The purpose of the review was to carry out an independent and comprehensive assessment of Green Belt within the Borough to inform the preparation of the new Local Plan. One of the key aims of the review was to provide clear conclusions on the relative performance of Green Belt which will enable Rossendale Borough Council to consider whether there are 'exceptional circumstances' (as per Paragraph 83 of the Framework) to justify altering Green Belt boundaries through the Local Plan process to meet development needs.

4.2 As previously identified, the Framework sets out five purposes of the Green Belt as follows:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and,
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.3 In common with other studies we have reviewed the LUC Green Belt Assessment firstly establishes Green Belt parcels – in this instance there are 80 parcels included within five broad areas of Green Belt. In that respect the subject site falls within Parcel 47, as identified below.

Figure 4.1 Extract from Green Belt Review (2016) Green Belt Parcels around Edenfield

4.4 Parcels were formed through the identification of land that contains the same or very similar land uses or character bounded by recognisable features. These features are described as:

- Natural features i.e. substantial watercourses; and
- Manmade features i.e. motorways A and B roads, railways.

4.5 Less prominent features such as walls, woodland, hedges, tree lines, streams and ditches were also considered where other more permanent boundaries were not present.

4.6 Two types of parcel were identified:

- Areas adjacent to built up areas (relatively small parcels); and

- Broad areas of Green Belt that may be more remote from settlement.

4.7 The boundary of Parcel 47 is identified in further detail in Figure 4.2 below.

Figure 4.2 Extract from Green Belt Review (2016) identifying Parcel 47

4.8 An assessment has then been made by LUC as to the ratings of the Green Belt parcels in Rossendale against the first four objectives of including land within the Green Belt as set out in Paragraph 80 of the Framework.

Figure 4.3 Extract from Green Belt Review (2016) – Overall Assessment Table

Figure 4.4 Extract from Green Belt Review (2016) – Parcel Ratings

4.9 It can be seen in Figure 4.3 that the Council's Green Belt Assessment for Parcel 47 concluded that the parcel has a 'strong' role in relation to Purpose 1a and Purpose 1b, a 'weak' role in relation to Purpose 2, a 'moderate' contribution in relation to Purpose 3 and a 'weak' contribution in relation to Purpose 4. Purpose 5 is not detailed within the table given that all sites have been considered as equal in this regard.

4.10 We have considered the Council's Green Belt Review and the analysis of the subject site below.

PARCEL 47

4.11 The assessment for Parcel 47 states that it lies adjacent to Edenfield and it lies between Edenfield and Rawtenstall.

4.12 In our view Parcel 47 is far too broad a study area which has led to skewed conclusions being reached by LUC. In our opinion there is a clear distinction between the western most part of Parcel 47 to that in the east. In that respect we comment on the conclusions reached by LUC below.

PURPOSE1A - DOES THE PARCEL EXHIBIT EVIDENCE OF EXISTING URBAN SPRAWL AND CONSEQUENT LOSS OF OPENNESS?

4.13 As identified within the assessment of the subject site, the land lies on the edge of Edenfield which forms part of the large built up area of Ramsbottom/Bury. The assessment considers that there are few urbanising features within the parcel and that there is a strong sense of openness. This may be the case for the eastern part of the parcel, however, the area to the west has a strong relationship with the existing urban area and the sense of openness is limited. Parts of the parcel are distinctly different in character and this means the assessment is flawed.

4.14 The western side of the parcel offers a sensible opportunity to round off the settlement and would not constitute unrestricted sprawl of the built up area.

4.15 Result: No contribution.

1B - DOES THE PARCEL PROTECT OPEN LAND FROM THE POTENTIAL FOR URBAN SPRAWL TO OCCUR?

4.16 Land on the western side of the parcel makes a Weak Contribution to protecting land from the potential for urban sprawl. Containment can be achieved using existing building lines and former field boundaries.

4.17 Result: Weak contribution.

PURPOSE 2: TO PREVENT NEIGHBOURING TOWNS MERGING INTO ONE ANOTHER

4.18 The assessment identifies that although this parcel lies between Edenfield and Rawtenstall, the settlements are 2km apart and so this parcel has a weak role in terms of preventing neighbouring towns merging into one another.

4.19 Again, the varying nature of land included within Parcel 47 makes it difficult to make a fair assessment and we consider that land on the western side of the parcel would have no contribution to this purpose.

4.20 Result: No contribution.

PURPOSE 3: TO ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT

4.21 It is stated within the assessment of Parcel 47 that properties along Plunge Road already give a sense of encroachment in this area.

4.22 In our view, existing buildings along Plunge Road, and others to the north along Boundary Edge and Gincroft Lane mark out the limits of the existing urban area. The western part of Parcel 47

does not go beyond these limits and therefore inclusion of some of this land within the urban area would not constitute encroachment. There is no basis for the Council considering that this site has a moderate role in this regard.

4.23 Result: No contribution.

PURPOSE 4: TO PRESERVE THE SETTING & SPECIAL CHARACTER OF HISTORIC TOWNS

4.24 The assessment of Parcel 47 considers its relationship with the historic settlement of Ramsbottom. However, it is concluded that the effects of development within this parcel on the character of the historic settlement are likely to be limited. We therefore agree with the conclusion that the site is rated as 'weak' in this regard.

4.25 Result: Weak.

PURPOSE 5: TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT & OTHER URBAN LAND

4.26 It is noted that in line with the methodology all sites have been considered as having an equal contribution to this purpose, though it is not stated what this is.

4.27 Result: Equal contribution.

OVERALL ASSESSMENT

4.28 We consider the assessment which has been carried out for the subject site, which comprises part of the land included within Parcel 47 to be flawed as it overestimates the value of the Green Belt in this location. This is largely due to the fact that the parcel is too large and varied in nature for a fair assessment to be made.

4.29 We advocate that our client's land, particularly that to the west, makes a very weak to no contribution to four of the purposes of including land in the Green Belt and the remaining purpose 5 cannot be used for assessment purposes as all of the sites in the Borough are given equal weighting.

4.30 In line with the Council's methodology the overall assessment for our client's site should therefore be weak.

4.31 We consider the subject site as an appropriate site for release from the Green Belt as it is adjacent to the settlement boundary and has existing development on 3 sides. The site would form a logical extension to Edenfield in this location.

4.32 We reserve the right to make further representations in support of the release of the subject site from the Green Belt.

5. REPRESENTATIONS

5.1 In light of the assessment included within this report, we consider that land at Elm Street, Edenfield should be considered for release from the Green Belt.

5.2 Figure 5.1 shows the current Green Belt designation which covers the site in the emerging Local Plan Proposals Map. The extent of the urban boundary of Edenfield is marked with a red line.

Figure 5.1 Extract from Local Plan Proposals Map identifying urban boundary

5.3 It is clear that the area which lies immediately behind properties on Rochdale Road is enclosed on three sides and, as set out in Section 4 of this report, has a very limited role in terms of the five purposes of the Green Belt as identified in the Framework.

5.4 The nature of the existing urban boundary in this location means that this part of the Green Belt provides an opportunity for rounding off the settlement without causing encroachment into the surrounding Green Belt which is more open in nature. In a Borough such as Rossendale which has a significant amount of smaller settlements and a large amount of countryside, it is imperative that sustainable sites on the edge of existing urban areas are fully considered in terms of their ability to meet the Borough's development needs where appropriate. Rossendale is further limited due to its topography and the subject site lies in a relatively flat part of the Borough.

5.5 Edenfield is a sustainable settlement and the subject site is within 150m of local services along the high street. The village has good road links to Ramsbottom, Rawtenstall and beyond. Access to the site is achievable via Elm Street.

5.6 The site is entirely appropriate for inclusion within the urban boundary of Edenfield. Indeed, part of the wider Green Belt parcel may have a future role in delivering sustainable development beyond the emerging Local Plan period.

PROPOSED MODIFICATION

5.7 The Council is respectfully requested to modify the proposed urban boundary of Edenfield to include land to the rear of properties along Rochdale Road as shown below.

Figure 5.2 Proposed Amendment to Green Belt Boundary

5.8 The extension of the urban boundary in this location is considered entirely appropriate having regard for the site's limited Green Belt function and the fact that it is bounded by the urban area on three sides.

5.9 We contend that this would properly reflect the provisions of Paragraph 83 of the Framework which sets out that amendments to Green Belt boundaries can only be made in exceptional circumstances and through the local plan process. In addition, the amendment to the Green Belt boundary in this instance would be fully in accordance with Paragraph 84 of the Framework which sets out that such amendments should only be made to facilitate sustainable development patterns.

6. CONCLUSIONS

6.1 The starting point for consideration of the Council's Local Plan is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 The Framework is clear at Paragraph 83 that Green Belt boundaries can be amended in exceptional circumstances, through the local plan process. Paragraph 84 further states that this can only be done in order to facilitate sustainable development.

6.3 It has been highlighted in this Representation that land at Elm Street does not meet the five purposes of the Green Belt as set out in Paragraph 80. As a result, and in order to provide for sustainable development over the plan period, the land should be included within the urban boundary of Edenfield and subsequently it should be removed from the Green Belt.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5142	Keith	Smith	Number of supporters:
Commenting on				HS2
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>Site HS2.76 Snig Hole Park, Helmshore</p> <p>Regarding the above site(s), I make the following comments which I have already lodged with the council on a previous date for consultation. These should be still available for inspection and should have been taken into consideration.</p> <p>The council appears not to have taken note of these as the sites are still in the list for release for housing development.</p> <p>The council also appears to ignore present government policy where greenbelt status should not be changed unless for very good reasons. There are no good reasons for releasing this land for the reasons stated below.</p> <p>In the council's assessment of this site(s) - the site is essentially two sites, separated by a private drive to a converted barn, which are quite separate - the land is assessed as 'flat' in the council's assessment. I confirm that this is not the case as there is a severe difference in level between the top and bottom of the site(s), enough to create problems of levels within the site. The existing condition of the natural terrain of the site(s) has therefore been ignored by the council in their assessment in order to make the sites appear more beneficial for development than they actually are.</p> <p>The council states that the present owner of the land is willing to develop the site(s). As far as I am aware there are two separate owners involved here. Not only that I suggest that any owner who is given a chance to increase the value of greenbelt land in their ownership by many times due to the council's change in policy will obviously welcome this proposal. Therefore I submit that this fact should be ignored and should not be part of the criteria for development of this land, nor any other in the borough where substantial financial gain is identified, and should not be used as an excuse to develop unsuitable land in the greenbelt.</p> <p>With due regard to the above I consider that other important aspects of development in this location are:</p> <ul style="list-style-type: none"> • The destruction of the Memorial Park and Country Park environment • The destruction of our local heritage • The safety of pedestrians and cyclists using the park and Cycleway B6 • The increase in traffic down the lane or any new junction with Helmshore Road <p>I am really concerned that in the future, if intrusion into the Green Belt is considered so indiscriminately by RBC, this is likely to happen again and again, especially in Helmshore which contains some of the prime sites in the borough, and this is a prime site, but not for housing.</p> <p>I chose to live in Helmshore because of its open character, woods and green spaces and views to the hills which promote a feeling of living close to the countryside which we know many other residents appreciate.</p> <p>The site in question exemplifies exactly that. But once developed it will destroy the ambience of the Memorial Park which is one of our village's prime assets.</p> <p>Whilst government still strongly support the retention of the Green Belt except in very special circumstances, Rossendale Borough Council appear to believe that cherry picking Green Belt land and using it to satisfy their housing allocation requirement is quite acceptable.</p> <p>Please take the above comments and those that I have already submitted into account regarding this site(s) when the council considers releasing greenbelt land for development.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5143 Mr**

Kay

Number of supporters:

Commenting on

HS2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

This representation is submitted on behalf of Mr R Kay in response to the Rossendale Local Plan Presubmission Version. This representation will respond to housing policies and allocations, and more specifically, is submitted to support the allocation of land at Bankside Lane, Bacup for the delivery of housing.

Firstly, with regard to the housing requirement, the Draft Local Plan identifies an overall requirement to provide at least 3,180 dwellings over the plan period, 30% of which are to be delivered on previously developed land under policy HS1.

Policy HS2 then goes on to identify various allocations across the district to meet the identified housing requirement. In total, sites have been identified to accommodate 2853 dwellings, which is some 330 dwellings short of the overall housing requirement.

Whilst it is accepted that some dwellings will come forward through windfalls, reliance upon windfalls to deliver housing cannot always be guaranteed, and there are always cases where allocations or planning permissions do not come forward. Therefore it is essential that additional sites are identified to accommodate development needs, particularly in the higher order settlements, such as Bacup.

By way of background, the previous consultation draft of the Local Plan undertaken during 2017 identified our client's site as HS2.12 (Huttock Top). This indicated that the site was proposed as housing allocation. The consultation document indicated that the site had a capacity to deliver around 30 dwellings to meet the housing requirement for Bacup.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5148**

Edenfield Community Neighbourhood Forum

Number of supporters:

1213

Commenting on

HS2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy HS2: Housing Site Allocations

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy

60. Strategic Policy HS2 identifies that proposed housing allocation H72 located within Edenfield will accommodate 400 dwellings. The Council has not justified the site selection process, particularly why Edenfield has been selected for such a large amount of housing in a single allocation.

61. The Local Plan has failed to allocate a key strategic site suitable for housing. The site is Stubbins Vale Mills (EE37) which has been partially vacant for several years and will be completely vacant in 2019. The owners have previously requested partial change of use to residential (refused) and now wish to dispose of the entire site for residential development. There is no justification for retaining this site for employment use when there is a significant amount of employment land remaining unallocated.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5150 Mr Alan Ashworth**

Number of supporters:

Commenting on

HS2

HS2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan comply with the duty to co-operate? **Did not answer**

I object to Rossendale Borough Council's Regulation 19 draft Local Plan on the basis that it is Unsound, it is Not Consistent with National Planning Policies and the Strategy adopted is Not Justified.

In particular I object to Strategic Policy SS relating to Edenfield and Strategic Policy SD2 and Policy HS2 (in so far as they relate to site H72) and Policy HS3.

The following evidence is supplied to support my claims:-

1) The Council have failed to demonstrate any "Exceptional Circumstances" that would justify the release of Land from the Green Belt in the Borough and therefore the proposal is contrary to National Planning Policy. Furthermore they appear to have overlooked the fact that Housing Need in itself is not an Exceptional Circumstance. My comments on the specific points they raised under Exceptional Circumstances in their Green Belt Topic Paper are as follows:-

a) To meet Housing Land Requirement through a balanced approach to supply. The Borough's target has been reduced from 3975 to 3180 for the fifteen year period from 2019-2034, a reduction of twenty percent. The new figure of 3180 equates to ten percent of the existing stock of homes in the Borough. In Edenfield there is to be an increase of approximately forty-seven percent to the Housing number, in comparison with the ten percent for the Borough as a whole, and this will double the built-up area of Edenfield and increase its population by fifty percent. The infrastructure is already under great pressure and the highways have been identified as being a major issue. How could this be considered to be a balanced approach to supply?

b) Address past under-delivery. This can surely not be considered to be a reason to release land from the Green Belt when the Council can simply reclassify empty employment sites for residential purposes. For example the Stubbins Vale Mill site could accommodate close to half of the total housing proposed on land in the Green Belt and the Council are aware that the site owners are interested in developing it for residential purposes. Part of this site is available now, the remainder will become available in 2019, before the Plan takes effect, and the majority of the infrastructure is in place to enable easy deliverability. This option and similar ones that are available should be used to meet the need to address the previous under delivery without taking land from the Green Belt for this purpose.

c) Provision of a balanced employment portfolio in suitable locations for the market. Whilst it is accepted that some of the extensions to the employment sites proposed in the Plan are sensible, for example NE1 to NE5 and M1 to M5, the Council need to re-examine their Employment Site List, include the numerous Sites that have been omitted and collate accurate figures on vacancies in terms of Offices, Retail Premises and Industrial Units on existing sites before taking the easy option of using Green Belt Land. The existing Employment Site Allocation list is inaccurate, sites are missed off the list and some of the site measurements are incorrect. (Refer to Appendix 1 section 3a & 3b.)

d) To enable a balanced approach of housing and employment. The Council have already identified more sites than are required to meet the future needs of the Borough for Employment and they have admitted that several sites have not been carried forward from the previous plan due to poor demand, or where sites are considered to be suitable for other development, including Residential. (Refer to page 54 in the Rossendale Draft Local Plan, Pre-Submission Publication Version, Regulation 19 Consultation and sections 1c, 3a & 3b in Appendix 1.)

If the sites that are not being carried forward were to be reviewed in an objective manner they would provide a far more balanced approach that would also eliminate any perceived need to use Green Belt land for housing.

e) Provide a good mix of housing types across the Borough. There is reference in section 1 of the Exceptional Circumstances (Green Belt Topic Paper, Part 7) to the large site at

Edenfield (H72) being able to contribute to a balanced housing supply by ensuring a mix of housing types and sizes, including affordable provision. This surely cannot in any way be considered as an exceptional circumstance when a good mix of housing types can just as easily be achieved on the larger Brownfield Sites available such as Stubbins Vale Mill. Green Belt Land should not be considered for release, while Brownfield sites are available.

f) Viability. The Council are putting forward an argument for Developers to sell properties (mainly four/five bedroom homes) at a premium price in Edenfield. The high values achievable, they say, would help to fund infrastructure. (Refer to page 25 in the Green Belt Topic Paper.) The infrastructure issues can be similarly funded from the construction of higher density housing on Brownfield sites such as those identified in item (e) above. The fact that values for residential development in the south-west of the Borough are higher than in other parts can hardly be described in any way shape or form as an exceptional circumstance.

g) Other Authorities are unable to meet housing /employment need. There is no need to seek assistance from other Authorities. The Council are aware that there are more than sufficient Brownfield and Mixed Sites to cover the needs identified for both Housing and Employment in Rossendale; they just need to reclassify the Brownfield sites that have not been listed. Again why they consider this to be an exceptional circumstance is difficult to comprehend. (Refer to 1c, 3a & 3b in Appendix 1.)

h) Improving the Green Belt. Policy HS3e (improving access to Green Belt land) is referred to stating that it will be “particularly important with respect to the land to the west of Market Street in Edenfield”. The Green Belt Topic Paper further states that “the developers of this site will be required to identify how they will address this issue.” I am at a loss as to how this could possibly be conceived to be an exceptional circumstance - any problems that arise will only be brought about by allowing building on the Green Belt. If the Green Belt is maintained and all new housing development takes place on the Brownfield and Mixed Sites, this is not an issue.

i) Other Issues Raised. A56 Border and Master Plan Scheme. These are two issues that should not have been taken into account. The A56 does divide the Green Belt in Edenfield into easterly and westerly portions, but the possibility of its being an alternative boundary is no justification for removing the easterly portion from the Green Belt. It is not exceptional for a road to run through the Green Belt. The same applies to the Masterplan Scheme, the opportunity to Masterplan the sites does not provide justification for removing it from the Green Belt. Any large undeveloped or cleared site can be master planned.

j) BC’s Conclusion. (Section 8 of the Green Belt Topic Paper.) I would robustly challenge the Council’s conclusion that after their examination of “a wide range of sites being considered and the potential for Brownfield land and higher densities given detailed examination” that it is still necessary to have to release Green Belt land for housing. There are many alternatives available to the Council and these are listed in Appendix 1 sections 1c, 1d, 1e, 1f, 3a and 3b. It is also apparent that the Council are keeping their options open on some of the Brownfield sites with their comments in the fourth paragraph of page 54 in their Pre-Submission Publication document.

2) The Strategy that Rossendale Borough Council have followed is not justified because it has not taken into account any reasonable alternatives. I believe there are sufficient developable Brownfield Land/Sites and other Sites within the Borough to satisfy the Housing Need without the need to release Land from the Green Belt. This statement is based on the facts gained from examination of the Regulation 19 Plan and comparison with the Regulation 18 Plan and noted below:-

a) The Brownfield and Mixed Site List issued on 26th June 2018 was compared with the previous list issued in July 2017 and it was noted that twenty-one Sites with the potential for 656 homes had been removed that were previously considered to be developable or deliverable or viable. The reasons for the removal include Landscape Impact, Access Issues, Topography and the possibility that they are more suitable for Employment Use. (Refer to item 1c in Appendix 1.) The Landscape Impact comments are truly amazing when the Council have chosen to ignore similar comments made by their own Consultants Penny Bennett Associates with respect to part of the Green Belt Land they

are proposing to release in Edenfield. The comment was:-“NOT SUITABLE FOR DEVELOPMENT ON LANDSCAPE”. (Refer to Appendix 3.) Additionally, the majority of those twenty-one re-classified sites failed to make it to the Employment Site Allocations List and are now presumably in the group referred to on Page 54 of RBC’s Pre-Submission Publication document. The relevant comment passage is:

“Following recommendations in the ELR, several employment site allocations and sites have not been carried forward from the previous plan primarily due to poor demand or where sites are considered to be better suited for other development, including residential. This is in line with the Framework, which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.”

b) An analysis of the Housing Site Allocation Lists issued in July 2017 and August 2018 highlights that 595 homes have been removed due to Highway Issues, Access, Flood Risk and Contamination etc when only twelve months previously they were considered to be acceptable. This represents close to seventeen percent of the homes identified on the July 2017 HSA list being removed. Surely this is excessive culling by any stretch of the imagination and needs to be re-examined? (Refer to item 1d in Appendix 1.)

c) A further analysis of the HSA July 2017 and August 2018 lists highlights that on fifteen sites the Council have reduced the density of homes, resulting in an additional loss of 189 homes when they should have been looking to optimise site density rather than use Green Belt. This is contrary to Paragraphs 122 and 123 of the National Planning Policy Framework. Other Site changes have resulted in a loss of a further twenty homes, making 209 in total. (Refer to items 1e and 1f.)

d) The Council’s Employment Site Allocation List at pages 51 to 53 of the draft Local Plan has been examined and found to be outdated and inaccurate with long-established Employment sites being missed off. They calculated a target of 27ha for projected growth for B1, B2 and B8 uses. (We cannot determine the breakdown of this particular figure or how it has been derived because we are still awaiting the publication of their Employment Land Review.) They have however identified 28ha for growth without including the Brownfield Sites that they reclassified from Housing to Employment Use and we estimate these to be close to 20ha. (More than sufficient to cover the Housing Need without having to use Green Belt Land.) (Refer to items 3a and 3b in Appendix 1.)

e) In the Green Belt Topic Paper produced by the Council there are only five Housing sites proposed and they are as follows:-

H 69 Cowm Waste Water Treatment Works 20 homes.

H 70 Irwell Vale Mill, Irwell Vale 45 homes

H 71 Edenfield Land East of Market Street 9 homes.

H 72 Edenfield Land West of Market Street. 400 homes.

H 73 Edenfield - Around Edenwood Mill / Wood Lane. 47 homes.

This gives a total of 521 homes proposed in the Green Belt of which 456 are in Edenfield. (87.5%). The developments proposed for Edenfield will virtually double the built up area for the village and increase the population by more than fifty percent.

f) Empty Homes. Statistics provided by Lancashire County Council highlight that there were 1,188 empty homes in Rossendale in 2017, and serious consideration must be given to including a proportion of these before releasing valuable and irreplaceable land from the Green Belt. This option has been utilised by the Authority for Burnley which is an adjacent Borough. (Refer to Appendix 2.)

g) Small Sites. The Council have identified 2,853 of the 3,180 homes target but they have not included the sites with five or less houses referred to as Small Sites. The shortfall is 327 which equates to 21.8 homes per annum. The Council have achieved this target in the past from the Small Sites and there is little doubt it can be achieved in the future. They have also not included “windfall developments” such as Hawthorn House which occur from time to time. Note the Small Site numbers only represent ten percent of the

total number of homes involved.

Conclusion. It will be apparent from the alternatives listed above that there were many choices available to Rossendale Borough Council to achieve easily the reduced target of 3,180 homes without resorting to the use of Green Belt Land. The difficulty is in trying to understand why they have chosen to ignore the facts and just blindly ploughed ahead with a proposal to destroy Village life in Edenfield, change it forever and utilise vast swathes of its valuable and irreplaceable Green Belt.

Furthermore they have failed to follow National Planning Policies or provide any justifiable Exceptional Circumstances.

I strongly recommend that they be instructed to re-examine the real possibilities outlined in items 2a, 2b, 2c, 2d, 2f and 2g but this time with a positive view based on the NPPF guidelines.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
Reference	5157 Ms Joanne Harding	Home Builders Federation
Commenting on	HS2	HS2
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound? No
		Does the Local Plan complies with the duty to co-operate? Did not answer

Policy HS2: Housing Site Allocations

Policy HS2 is not considered to be sound as it is not positively prepared for the following reasons:

Table 1 (as amended) identifies allocations for 2,853 dwellings, this is below the housing requirement and suggests a reliance on other sources such as small sites or windfall. The details of this additional supply do not appear to be set out within the Local Plan document.

The HBF do not wish to comment upon the acceptability or otherwise of individual proposed allocations. The HBF would recommend that a greater number of sites are allocated to provide a buffer over and above those required to meet the plan requirement. The reason for the application of a buffer of sites is two-fold. Firstly, the plan housing requirement should be identified as a minimum to conform to the NPPF requirements to boost supply and plan positively. It therefore stands to reason that the plan should seek to surpass this requirement. Secondly, a buffer will provide a balance against the inevitable under or none delivery from some existing commitments or proposed allocations.

The HBF proposes that the policy is modified as follows:

- Additional sites are allocated for housing development.

Do you wish to participate to the Examination In Public? Yes Reasons

Reference	5160	The Peel Group	Number of supporters:
Commenting on	The housing land supply and site specific comments	HS2	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	Did not answer

Paper 1:

5. The housing land supply

5.1 The DLP identifies a housing requirement of 3,180 additional dwellings during the plan period 2019 to 2034. This is intended to be delivered through a variety of sources of land, including 75 sites specifically allocated for residential development, proposed to provide 2,853 dwellings. This falls 10.3% (327 units) short of the proposed housing requirement of the PSLP. This gap in provision is proposed to be met through small sites (i.e. delivery from sites of less than five dwellings) and vacant homes coming back into use.

5.2 Peel does not agree that the sources of supply will provide the level of development anticipated by the Council. This is supported by prevailing evidence as presented in Paper 3 submitted as part of this representation. Each matter considered in Paper 3 is summarised below.

Requirement for a flexibility allowance

5.3 An appropriate allowance for unforeseen circumstances or non-delivery of sites which might otherwise pass the ‘developable’ test should be included in the Council’s calculation of realistic supply. Based on data from a range of market areas, DCLG analysis has indicated that between 10 and 20% of planning permissions are not implemented whilst a further 15 to 20% are subject to revised application proposals resulting in delays to delivery. As such it is reasonable to assume that upwards of 15% of total supply anticipated will not come forward during the plan period to 2034.

5.4 The need for a flexibility allowance to account for under delivery is being pursued in a number of Local Plans within the wider region and is emerging as good practice to provide certainty that plans will be delivered. It is also supported by the Local Plans Expert Group. This can be achieved through making allocations above the housing requirement or allocating ‘reserve sites’ which can come forward in the event of non-delivery. This is especially relevant in Rossendale where, notwithstanding the comments provided in section 3 of this report, the PSLP will be reliant upon delivery in a number of weak market areas.

Small sites and vacant homes

5.5 An allowance for small sites should only be applied to years 4 to 15 of the Local Plan based on the evidence presented by Arup in its ‘critical friend’ review of the SHLAA. The PSLP proposes an allowance for small sites from years 1 to 15. Based on the historic average, Peel considers that small sites would yield up to 207 dwellings over the plan period.

5.6 The supporting text to Policy HS2 states that “bringing vacant dwellings back into use is not counted within the allocations in line with national guidance”. This implies that RBC is relying on delivery of housing through bringing vacant housing back into use to make up the gap in the housing supply. Paragraph 70 of the NPPF is clear that where an allowance (windfall) is to be made as part of the supply there should be compelling evidence they will provide a reliable source and that this will continue in the future.

5.7 The PSLP and the supporting Topic Papers provide no detail on historic supply from vacant units or how this is set to emerge in the future. This evidence should include funding streams which may be available to housing providers and at the very least the number of dwellings which have been developed in this manner since the adoption of the Core Strategy. No reference has been made by RBC on these points.

5.8 Therefore any allowance from vacant dwellings coming back into use should be disregarded as a contribution to housing supply, based on the wording of the NPPF.

Assessment of individual allocations

5.9 An assessment of all sites proposed for allocation through the Local Plan has been undertaken by Peel’s consultant team to determine whether each can reasonably be defined as a developable site based on the definition in Annex 2 NPPF, that being ‘...in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.’ In this instance the ‘point envisaged’ is 2034. From this assessment a more realistic developable supply from the allocations identified is set out.

5.10 The PSLP allocates 75 sites for residential development with an assumed cumulative capacity of 2,853 units. Peel’s review of the allocations has identified a series of critical

concerns around a number of sites, including known physical and ownership constraints. As a result it considers that the PSLP has not demonstrated these sites are developable (having regard to the NPPF definition) or will deliver the number of units the Council assumes.

5.11 A detailed appraisal of each site is presented within Paper 3. This concludes that 30 of the 75 sites do not meet the definition of developable and should be entirely discounted from the Local Plan supply. The Council has overestimated the realistic yield from a further 14 sites and underestimated the yield from three sites. The effect of this is that the realistic developable supply from the 75 allocations is 1,895 units, rather than 2,853 as claimed by the Council. An allowance of 207 dwellings from small sites can be added to this giving a total developable supply of 2,102 units from the sources identified.

Housing land supply – summary and assessment of soundness

5.12 It is a critical requirement of the plan that it delivers, with certainty, a sufficient supply of homes, in accordance with NPPF (paragraph 59). Local Plans must identify a supply of developable land to achieve this over the plan period (paragraph 67).

5.13 The PSLP seeks to achieve this through allocation of sites for development and reliance on various sources of supply. In this case, Peel does not consider the sources of land identified by the Council to be capable of delivering the numerical requirements of the PSLP even based on an annual housing requirement of 212 units per annum, which Peel believes to be below the proper requirement (see section 4). Collectively this does not present a developable supply of land to the level assumed by the Council.

5.14 Peel's analysis has demonstrated that the realistic developable supply identified by the Council is 2,102 units. Based on different requirement scenarios, this would present a shortfall against the requirement as follows:

- a) 1,078 units based on 212 units per annum between 2018 and 2034;
- b) 1,873 units based on 265 units per annum between 2018 and 2034;
- c) 1,502 units based on 212 units per annum between 2018 and 2036;
- d) 2,403 units based on 265 units per annum between 2018 and 2036.

5.15 As outlined previously, Peel considers that the Local Plan should be progressed on the basis of a housing requirement of 265 units per annum and should cover the period to 2036 (scenario d above). Having regard to the realistic developable supply, a shortfall in housing land supply of 2,403 against the proper Local Plan requirement would exist.

5.16 This shortfall would increase to 2,854 when a flexibility allowance of 10% is applied to the overall requirement (increasing this to 4,955) or to 3,079 based on a 15% flexibility (bringing the total requirement to 5,181 units) as also proposed by Peel for the reasons explained.

5.17 The Local Plan will therefore need to find an additional source of land to meet this residual requirement if it is to progress on a sound basis. This will need to be met exclusively through the release of land in the Green Belt and open countryside.

5.18 As a result the above, the PSLP as presented does not satisfy paragraph 67 of the NPPF. This aspect of the plan is not consistent with national policy and is unsound therefore. Further, the inadequacy of the housing land supply means that the PSLP is not effective in meeting the development needs of the Borough, raising a further critical point of soundness.

5.19 In order to correct soundness, a further supply of developable land capable of providing an additional c3,000 residential units needs to be identified by the Council and allocated for development through the Local Plan. This should include Peel's land holdings at Haslam Farm, Moorland Rise and Burnley Road each of which have been proven to present suitable and deliverable development opportunities capable of delivering affordable housing through previous submissions to the Local Plan. Updated Development Framework plans in respect of these sites are submitted as part of these representations at Appendix 2. Specific comments on these sites are provided in section 7 of this representation.

8. Site specific comments

8.1 Peel has a number of land interests in Rossendale which it has promoted for development throughout the progression of the Core Strategy and Local Plan. This has included submission of Development Frameworks in 2013 setting out an analysis of each site and the development potential presented. Subsequent to this Peel provided the Council with further technical information relating to site access/highway impact, flood risk and drainage and landscape impact in respect of each site as part of its representations to the

Lives and Landscapes DPD in 2015. In 2017 an analysis of each site's Green Belt contribution, in response to the findings of the Council's 2016 Green Belt Review, was included as part of Peel's representations to the Draft Local Plan in 2017.

8.2 The Council has been aware of these development opportunities and Peel's proposals for the site since before the preparation of the Core Strategy. The Development Frameworks and subsequent evidence submitted have demonstrated that each site represents a suitable and sustainable development opportunity, capable of making a positive contribution to meeting Rossendale's needs for high quality family housing, including affordable units, and that through a considered design response, identified constraints can be adequately mitigated. This evidence also demonstrates that none of the sites would give rise to unacceptable impacts in terms of landscape, traffic / transport and flood risk / drainage. Each makes a limited contribution to the Green Belt and the strategic function of the Rossendale Green Belt would not be prejudiced by the release of these modest scale sites.

8.3 Updated Development Framework plans are provided as part of these representations at Appendix 2.

8.4 The previous sections of this report and the accompanying papers have demonstrated the need for the release of additional land, and an increase in the allocation of land in Rawtenstall and the western parts of the Borough, to meet Rossendale's housing requirements. Exceptional justification for the release of Green Belt land for this purpose exists.

8.5 In this context, each of Peel's sites should be released for development. In this regard, the following site specific comments are made:

☑ Land at Haslam Farm, Rawtenstall – this paper has identified a need for the release of additional Green Belt to deliver around 3,000 dwellings over the plan period and for additional development in Rawtenstall to effectively deliver the plan's spatial strategy. This provides strong strategic level justification for the allocation of this site therefore. The northern part of the Haslam Farm site has previously been proposed as a residential allocation through the Draft Local Plan. The Council's reasons for not carrying this forward are set out in the Housing Topic Paper. The table at Appendix B of this paper presents sites which were proposed for allocation in the Draft Local Plan which are now not proposed for allocation in the PSLP. A total of 38 sites are listed. The table provides comments on each. In respect of the subject site it simply states the following: Stepping stone habitat. Landowner wants expansion to south. Objection from ELR Ltd. Strong objection from Residents and Friends of Townsend Fold (petition). Significant underground infrastructure limiting development. Green Belt

Nowhere has the Council presented a full assessment of the site nor has it considered whether the potential constraints identified can be overcome. It has taken the decision to 'deallocate' the site without express justification for this.

A number of points are raised in the commentary. In response the plan at Appendix 2 shows how this site could be delivered allowing for an easement requirement to avoid building over the Haweswater Aqueduct which runs beneath the site. This shows that a viable and appropriate development of 155 dwellings can still be achieved on this site. There are no constraints to the achievement of a suitable site access, as demonstrated through the Updated Development Framework. Notwithstanding this, the plan at Appendix 2 shows that the site benefits from multiple options for achieving an adequate access, with an access of Holme Lane to the north of the site being equally viable and appropriate.

Finally in respect of the Council's reasons for not taking this site forward through the Local Plan, objections from local residents and the opportunity of an adjacent leisure facility does not provide justified reason for discounting the site. The representations of the community and the ELR are relevant but should only be given weight insofar as they raise valid points, relevant to planning. The existence of objections, however significant in number, does not justify the Council's decision and is strongly challenged by Peel.

The full site (both north and south parcels) should therefore be allocated for residential development through the Local Plan with a development capacity of approximately 155 dwellings.

- Land at Blackburn Road, Edenfield – the proposed allocation of Peel's land at Blackburn Road, Edenfield (as proposed through Site Allocation H72) is supported. As evidenced through the submitted Development Framework, and associated technical evidence shared with the Council, the site is not affected by any insurmountable constraints and an adequate access into the site off Blackburn Road can be achieved. It occupies a sustainable location in relation to the settlement of Edenfield and makes a very limited contribution to the Rossendale Green Belt. The site can make a contribution to affordable housing also.

- Land at Burnley Road, Edenfield - In the context of the need to identify an additional supply of land to deliver around 3,000 additional residential dwellings over the plan period, the allocation of Peel's land at Burnley Road would represent a sustainable approach to growth. As demonstrated through the submitted Updated Development

Framework, and associated technical evidence shared with the Council, the site is not affected by any insurmountable constraints, occupies a sustainable location within the settlement of Edenfield, close to key services and public transport connections, can achieve an acceptable site access arrangement and will not give rise to any significant impacts from a landscape, highways and flood risk/drainage points of view, subject to a careful design approach being pursued. The site can also make a contribution to affordable housing. It should be allocated for development within the Local Plan with a development capacity of approximately 38 dwellings.

- Land at Kirkhill Avenue/Moorland Rise, Haslingden – Peel fully supports the proposed allocation of land at Kirkhill Avenue for residential development. However it considers that the allocation should be extended to include the adjacent Moorland Rise site. These sites combine to present a single integrated development opportunity and rounding off of the north eastern part of Haslingden up to the logical settlement boundary provided by Kirkhill Road/Haslingden Old Road.

In the context of the need to identify an additional supply of land to deliver at least a further 3,000 residential dwellings over the plan period, the allocation of the Moorland Rise site would represent a sustainable approach to growth. This would require a modest release of land from the Green Belt and, as demonstrated through the submitted Development Framework, and associated technical material shared with the Council, could be delivered in a manner which avoids material harm to the landscape and via an acceptable access solution. The combined site can also make a contribution to affordable housing. The allocation at Kirkhill Avenue should therefore be extended to include the Moorland Rise site with a combined development capacity of approximately 110 dwellings.

It is noteworthy that the Council has previously deemed the full site to be suitable for development in principle through the proposed allocation of the Moorland Rise site as 'safeguarded land' in the Draft Lives and Landscapes DPD (the previously proposed Part 2 plan to the Core Strategy), alongside the allocation of the Kirkhill Avenue site for development during the plan period.

Paper 3: Critique of the Housing Land Supply
Please see appendix.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5174**

Winfields Holdings Ltd and Winfields Ltd

Number of supporters:

Commenting on

Policy HS2: Housing Site Allocations

HS2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

As identified previously, in order to meet the Borough’s housing requirements and reduce pressure on greenfield sites, historic employment land that has little or no prospect of being developed for that purpose should be released either as part of a mixed use scheme or for stand alone residential purposes. The land at Hud Hey (EMP2- Site EE12) extends to some 8Ha with much of it being long term vacant despite having being allocated for employment purposes since before 1995. A restricted area currently accommodates Winfields Limited’s warehousing and Head Office operations, but the intention is to relocate these operations to the company’s site at Acre, (thereby retaining that business and potentially expanding its existing contribution to local employment). The land currently identified for employment purposes includes a number of residential properties which intrude into the northern section of the site as well as extending along most of its eastern boundary. The site also includes an extant consent within the recently listed Britannia Mills for retail use, further emphasising its mixed use credentials. A significant proportion of the site was historically cleared in order to make it more attractive to the market, but without any interest arising despite being allocated for employment purposes since at least 1995. In this respect, Government is clear (as set out at Paragraph 120 of the NPPF) that planning policies should avoid the long term protection of sites allocated for a specific use where there is no reasonable prospect of them being used for that purpose. As identified, there is a recognised supply of vacant employment sites of this nature throughout the borough with no reasonable prospect of them being used for the allocated purpose, contrary to the suggestion within the commentary to Policy HS1. The Government suggests that the best use should be made of previously developed or brownfield land (Para 117 of the NPPF), particularly where it would help meet identified needs for housing. It is not suggested that employment uses are necessarily excluded but rather that the site is identified as being suitable for residential as well as other purposes, which will enable it to make a meaningful contribution to the Council’s housing requirement on a brownfield site in a sustainable location close to a range of opportunities and services that are well served by public transport. This would, in turn, reduce the need to release greenfield sites elsewhere within the borough. As identified above, the status of the site has already changed since its initial allocation for employment purposes prior to 1995, with the grant of retail consent for Britannia Mill (lawfully commenced) emphasising that the site would more appropriately be identified for mixed use purposes. The recent Grade II Listed status accorded to the Mill also requires an alternative approach, particularly given the cost of renovating and maintaining this building, which the allocation also needs to address. There are also significant highway constraints that suggests the land would be best used for residential purposes. In summary the site should be allocated for mixed use and/or residential purposes.

Land at Hud Hey should be allocated for residential development. There is significant previously developed land beyond the former mill ponds that are available to make a meaningful contribution to housing needs in a sustainable location adjoining existing residential properties.

10.

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference **5176 Mr**

Warren

Hilton

Highways England

Number of supporters:

Commenting on

HS2

HS2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

'Policy HS2: Housing Site Allocations' details the sites in terms of the number of potential dwellings and delivery timescales. The corrections identified in the errata for Table 1 are noted. The majority of new housing need (approx. 50%) will be located in and around the main centres of Rawtenstall and Bacup.

Masterplans are to be prepared for development sites with more than 50 dwellings. Of interest to Highways England, is the Edenfield site (Housing Allocation H72), a 15.25-hectare site which abuts the A56 (T) carriageway and has the potential to significantly impact upon the safety and operation of the SRN. It is unclear what access arrangements have been considered for this housing allocation, or that appropriate mitigation measures have been identified to address any significant impact on the SRN. As such at this stage Highways England do not consider there is robust evidence to support the inclusion of this allocation and its removal from the Green Belt. Notwithstanding this, the presence of an existing land-slip beneath the site now dictates that the Council must now carry out a geotechnical assessment in order to provide a robust indication of the extent to which the allocation may be developed / contribute towards the housing target.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5188	Crystal Hurstwood	Number of supporters:
Commenting on	HS2	HS2	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer
Does the Local Plan complies with the duty to co-operate?	Did not answer		

Policy HS2: Housing Site Allocations

In the earlier version of the draft 'Local Plan Part 2: Site Allocations and Development Management Policies' published in 2015, the land behind the former hospital site off Union Road was proposed for removal from the Green Belt and allocation for residential development (Ref: H27 – land behind the former hospital site, Rawtenstall). The Council's view at that time was that the site was a suitable candidate for release, reflecting its proximity to the adjacent major developed site and the very limited impact the development of this land would have on the openness of the wider Green Belt in this location. The draft Local Plan anticipated the delivery of approximately 66 houses across the site, albeit in the middle part of the plan period (years 6-10). This was informed by the landscape and visual assessment undertaken by Penny Bennett Landscape Architects in February 2015, who concluded that the site was suitable for development with mitigation.

In the October 2017 consultation version of the new Local Plan, the Council inexplicably changed its view on this site. The plans published last year were not very clear, but it appeared that only a very small part of this site was proposed for allocation as part of what was draft allocation HS2.62, which also covered land outside our client's ownership. The remainder of the land was proposed to stay within the Green Belt. We submitted a representation at that time expressing our concern about this unexpected and unjustified change to the status of the Union Road site, and strongly objected to this part of the draft Local Plan.

The Council appears to have dismissed our comments and now in the current version of the draft Local Plan the entirety of this site has been omitted from the proposed housing allocations. We also note that the new build housing estate at the former hospital site remains washed over by the Green Belt, despite that land being fully developed and performing no meaningful Green Belt function whatsoever. We consider that the Council's approach to this area of land is wholly inappropriate and unjustified.

We previously supported the Council's decision to remove this land from the Green Belt, which corresponded with our previous representations and robust assessment that the site is performing a very limited Green Belt function. This land represents an appropriate location for the release of Green Belt, and this is clearly required to meet some of the development needs of the Borough. This accords with the Council's own published evidence base, whereby the site was assessed as part of 'Land Parcel 14' in the Green Belt Assessment (LUC, November 2016) as performing as follows:

- Purpose 1 – not applicable
- Purpose 2 – strong
- Purpose 3 – weak
- Purpose 4 – no contribution
- Purpose 5 – equally significant with all other parcels

The site was therefore found to perform a 'strong' function against only one of the five purposes of the Green Belt. The site was otherwise assessed to make either a weak or no contribution against two of the other purposes. One purpose was not applicable, and the assessment against the fifth purpose is the same for all sites and therefore this land fares no better or worse than others. Overall, the LUC report demonstrates that there is no strong justification to retain this land within the Green Belt.

The site has also been assessed in the Strategic Housing Land Availability Assessment (SHLAA, August 2018) under site Ref: SHLAA16318 ('Kirkhill Rise C, Land behind Hospital site, Rawtenstall). This report concludes that the land is available, viable and generally suitable for residential development in the medium term. The assessment envisages the delivery of 24 dwellings in the six to ten-year period.

However, we note that the site has now been identified as a 'Wetland and Heath Stepping Stone Habitat' in the 'Lancashire Ecological Network Map', and the area available for development has therefore been reduced by 50 per cent to protect part of the habitat. We have serious concerns about the transparency and robustness of this designation. We assume that the Council is referring to the analysis undertaken over recent years by the Wildlife Trust for Lancashire, Manchester and North Merseyside (LWT), together with the Lancashire Environment Record Network (LERN), on behalf of the Lancashire Local Nature Partnership. We have looked at this document and associated available mapping,

and note that the Lancashire Ecological Network

Approach and Analysis report (Version 1a, June 2015) includes the following clear caveat:

‘Results from the Wetland and Heath ecological network analysis need further refinement and should be treated as draft at this stage.’ (our emphasis added)

We are not aware of any final and approved data for the wetland and heath category, and therefore the Council should not be making strategic planning decisions based on the draft data which are yet to be finalised. The report comes with this very specific health warning, which the Council seem to have ignored. The Council appear to have used this data to rule out areas of land, and we consider that this approach is flawed and potentially erroneous. Until such a time as this element of the data are in an agreed form, the Council should not be treating this as an absolute constraint. Furthermore, there has been no public engagement during the production of this work, and we have not been offered the opportunity to comment on or challenge this designation.

Not only this, but there is no information in this report which shows that the Union Road site is a ‘stepping stone’ for wetland and heath habitats. Our own Ecological Assessment of the site has identified small patches of marshy grassland on the site, which are not considered to meet the Lancashire Biodiversity Habitat Action Plans. No locally important designated sites are within the site boundary. The closest Important Wildlife Site (IWS) is Lower Pike Lowe Quarry which is located 20 m from the western boundary of the site. The IWS is designated for its characteristic dry acid grassland. IWSs represent the ‘second tier’ of non-statutory designated sites in Lancashire, and are considered to be ‘Local’ value for nature conservation. The closest Biological Heritage Site to the proposed development is Brown Edge Fields, an area of acid grassland and heath located approximately 1.5 km to the northwest of the site. BHSs represent the ‘first tier’ of non-statutory designated sites in Lancashire, which are considered to be the equivalent of ‘County’ value for nature conservation. The site has demonstrably little ecological value and the assessment of this site in the SHLAA is fundamentally flawed.

We also note that the SHLAA only reduces the site capacity by half, and does not suggest the entire site should be ruled out on this basis. With this in mind, there is no good reason why the Council should remove this previously proposed housing allocation.

We also question the decision not to extend the urban boundary around the former hospital site, which is now redeveloped for housing. This land is performing none of the Green Belt purposes following its complete redevelopment, and therefore we cannot understand why the Council has not taken this opportunity to propose a sensible amendment to the Green Belt and urban boundary to reflect the new extent of the built up area in this location.

For the reasons set out above, we believe that policy HS2 as currently drafted is unsound. We have profound reservations over the reliability and robustness of the approach to assessing potential residential development sites, and indeed the appropriateness of the urban and Green Belt boundary.

To remedy this, we would therefore request that the Council (i) re-visits the SHLAA assessment of all sites affected by the clear mistake in the application of the wetland and heath habitat data, and (ii) reconsiders its approach to this site and reverts back to allocating the land at Union Road as it did in the previous 2015 draft ‘Local Plan Part 2’. To be clear, we consider that the Council should extend the urban boundary to include the former hospital site and the land to the rear in control of our client. The Council has previously recognised that the site is suitable for development, and we maintain that the site can accommodate a high quality scheme that will sit alongside the current development on the former hospital site. We also previously emphasised that the site is fully deliverable in the early stages of the plan period with confirmed market interest, and would like to take this opportunity to reiterate these points. This site is capable of making a genuine contribution towards meeting the housing requirements in the Borough and its inclusion will help ensure that the plan is robust and sound.

We trust that these comments are helpful and will be taken into consideration. Please contact me if you require any further information, and in the meantime we trust that we will be kept informed of the next steps in the preparation of the Local Plan.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

HS2 and HS3 (H71, H72 and H73)

Reference	119 Mr Paul Formby	-	Number of supporters:
Commenting on	-	HS2 and HS3 (H71, H72 and H73)	HS2 and HS3 (H71, H72 and H73)
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	Yes

1. At page 18 of the Local Plan Written Statement (Regulation 19) it is stated that: 'The SHMA recommends that the need for additional housing in Rossendale is between 265 and 335 dwellings per year. The Council considers that a figure of at least 265 additional dwellings per year would be sufficient to meet Rossendale's housing needs over the plan period. This equates to a total number of dwellings to be provided over the plan period of 3975. Since the SHMA was produced the Government has announced its intention to implement a standard methodology for calculating housing figures. Using this approach the relevant annual housing provision for Rossendale is set at 212 homes per year. This figure is applicable for 10 years but the Council has extrapolated this over the Plan period, giving a housing figure of 3,180 dwellings.' As such the target number of homes has reduced by 795 or 20% of the original housing target. However, none of this reduction has been applied to the proposed development in Edenfield which means that Edenfield would bear a significant and disproportionate burden of the proposed new homes to be built in Edenfield. In the Greenbelt Topic Paper reference is made to Gallagher Homes v Solihull Borough Council (2014) in which it was held that in relation to the release of greenbelt the Local Authority needed to establish exceptional circumstances but that the boundaries cannot be revised further than is necessary to meet those exceptional circumstances. Given that the overall housing target in Rossendale has been reduced by 795 it is therefore unsound to continue to propose to build 400 new homes on greenbelt in Edenfield.

2. At page 19 of the Local Plan Written Statement (Regulation 19) it is stated that: 'Previously developed (brownfield land) has been identified wherever possible but the supply of sites without significant constraints within the urban boundary is limited. Overall 152 brownfield sites were considered comprising a total of 182.4 ha. 39 of these sites are proposed for development on an area of approximately 45ha.' The approval for development of 45ha of brownfield sites from a possible 182.4 ha is not consistent with a desire to identify brownfield sites wherever possible. One of the exceptional circumstances given as justification for the release of greenbelt land in Edenfield is that the housing built there would attract a premium due to the demand for housing in Edenfield. The premium that the developers would enjoy for housing built on released greenbelt land from Edenfield as opposed to the development of brownfield sites does not constitute exceptional circumstances and does not meet the guidance given in Gallagher Homes v Solihull Borough Council (2014) to keep the proposed revisions to greenbelt to the minimum revision required.

3. At page 26 of the Local Plan Written Statement (Regulation 19) it is stated that: 'Edenfield Primary School is operating close to capacity and there is no capacity at Stubbins Primary School. The preferred course of action of the Education Authority would be to expand Edenfield School onto adjacent land provided that any access issues can be overcome. Should this not prove feasible land would need to be allocated within the proposed residential area for this purpose.'

4. I have made enquiries with the leadership and governors of Edenfield Primary School and have been informed that they have not been approached by the Local Authority for their comments regarding any proposed expansion of Edenfield Primary School. I am of the opinion that the site on which Edenfield Primary School is based is too small for the development proposed in the Local Plan Written Statement (regulation 19). If a new Primary School is required on the land which is proposed to be released from the greenbelt this will impact the number of homes which can be built on the greenbelt yet no provision for the same is made within the Local Plan Written Statement (Regulation 19).

5. On 20 July 2015 the Council published a Local Plan in which no proposed changes to the greenbelt in Edenfield were to be made. On 26 February 2016 the Council published the decision to withdraw the original Local Plan in order to review the same and publish a revised, the current, Local Plan. On 25 July 2018 the Council published the current Local Plan further to which it is proposed to release over 15.25ha of land from the greenbelt in Edenfield in order to allow 400 new homes to be built. Enquiries I have made with HM Land Registry have identified that on 28 July 2016 (ie after the withdrawal of the original Local Plan (in which no greenbelt land was to be released) but before the publication of the current Local Plan (in which it proposed that 15.25ha of land will be removed from the greenbelt in order to build 400 homes) land on the west side of Market Street, Edenfield, Ramsbottom, Bury (which forms part of the 15.25 ha) and registered at HM Land Registry under title number LAN180337 was purchased by Taylor Wimpey UK Limited. I am not privy to the commercial considerations made by Taylor Wimpey UK Limited when making the decision to purchase this land. However, I do find the timing of this purchase (prior to the publication of the proposal to release the same land from the greenbelt) surprising. What, if any, contact was there before the publication of the current Local Plan between the Council, the planning department or the Council's employees and Taylor Wimpey UK Limited? If Taylor Wimpey UK Limited were aware of the Council's proposal to release the land in Edenfield from the greenbelt before their purchase of the land then in my view this would make the Council's

decision to release land from the greenbelt in Edenfield unsound.

Do you wish to participate to the Examination In Public? **No**

Reasons -

Limey Valley

Reference **84 Mr Ben De Loup**

-

Number of supporters:

Commenting on -

Limey Valley

Is the Local Plan legally compliant? **Yes**

Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Yes**

The proposal for approx 200 new houses to be built in the Limey Valley is utterly preposterous for the following reasons:- Because the geography of the valley dictates that all traffic getting in and out have to use Burnley Road, the pollution in Crawshawbooth village centre is undoubtedly causing health problems already. Emissions will stay in the valley and this has a direct correlation to increase respiratory problems of the residence.- The infrastructure If the highways can not be improves due to the geography of the Limey Valley. It is already way over capacity with long queues of over a mile to get to the M66 every morning further exacerbating the pollution problem and the extensive congestion issues.- the schools do not have capacity to accommodate the estimated extra pupils and there is no option to expand existing facilities.- the vast majority of the land proposed for development is green belt land. There are much more appropriate brown field sites available to meet this quota across Rossendale and Darwen an Lancashire. The Limey Valley should remain countryside.

Scrap all plans on Green field sites and relocate to brown field sites.

Do you wish to participate to the Examination In Public? **No**

Reasons -

New allocation

Reference **5196 Mr and Mrs**

Ward

Number of supporters:

Commenting on

Land south of Edinburgh Road, Helmshore

New allocation

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan comply with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. The most recent consultation on the draft Local Plan was undertaken in summer 2017 and comprised the Regulation 18 stage. This Representation is submitted in response to the Council's current Publication Pre-Submission version of the Plan (Regulation 19). The consultation period runs from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the adopted Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses, as identified on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation. For clarification, the Council's Errata to the Publication (Pre-Submission) version of the Local Plan (dated 03 September 2018), has been noted but it does not relate to the matters pertinent to this particular Representation.

BACKGROUND

1.4 Hourigan Connolly is instructed to review and comment on the emerging Local Plan in relation to land to the south of Edinburgh Road, Helmshore. This Representation is submitted on behalf of the land owners, Mr and Mrs S Ward.

1.5 The site is not allocated for any designated use and is proposed to be located adjacent to, but outside of, the urban boundary. This Representation sets out why the Council should allocate the land for housing and redefine the urban boundary to include the land within it.

1.6 A title plan is provided at Appendix 1. The title plan relates to land within Mr and Mrs Ward's ownership and includes land beyond that to which this Representation relates. Page 2 of Appendix 1 indicates the extent of the area (shaded and edged in red) sought to be allocated for housing in the Local Plan and to which this Representation relates. However, for assistance Figure 1.1 overleaf is also provided to illustrate the location of the site in Helmshore ward:

Figure 1.1 Location of subject site, land south of Edinburgh Road, Helmshore (approximate area circled in red).

1.7 As part of the Council's previous 'Call for Sites' exercise, an agent on behalf of the land owner made representations promoting the site for housing development as part of a wider area, i.e. the entire area of land shown on page 1 of Appendix 1. The site has been included in the Council's Strategic Housing Land Availability Assessment (SHLAA) Update 2018, being recorded as Site Reference SHLAA16300. The SHLAA concluded that the promoted area of land was available and achievable, but not suitable for the delivery of houses. The SHLAA entry is contained at Appendix 2 to this Statement.

1.8 Since the submission of those previous representations, the landowner has revised their approach to the promotion of the subject site, and reduced the area promoted for a housing allocation. The site measures an area of circa 0.63 hectares and can be found to the south of Edinburgh Road in the western part of Helmshore, Rossendale.

1.9 The owners of the site wish to promote the site for a housing allocation in the emerging Local Plan and this Representation will demonstrate its suitability for this use as the site is located in a sustainable location immediately adjacent to an existing and established residential area in Helmshore.

SCOPE

1.10 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

OVERVIEW

1.11 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Council's such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The National Planning Policy Framework (hereafter referred to as the Framework) (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018, however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.1 Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making. The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development. These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by

creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.
- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.
- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159), business (Paragraphs 160 – 161), infrastructure (Paragraph 162) and environment (Paragraphs 165 – 168).

HOUSING

2.21 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.22 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- “meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and

- caters for housing demand and the scale of housing supply necessary to meet this demand”.

INFRASTRUCTURE

2.23 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.24 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.25 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.26 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.27 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report, in particular paragraph 030 (reference ID: 3-030-20140306 confirms):

“Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.28 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306):

“WHAT CONSTITUTES A ‘DELIVERABLE SITE’ IN THE CONTEXT OF HOUSING POLICY?”

Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe. The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.”

2.29 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that:

“HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?”

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.30 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.31 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which have been submitted or will be submitted before 31 March 2018.

2.32 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.33 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

2.34 Crucially the provision of the right type of housing in the right locations is considered to be relevant to this Representation.

3. POLICY HS2: HOUSING SITE ALLOCATIONS

INTRODUCTION

3.1 Policy HS2: Housing Site Allocations identifies all sites within the Borough which have been allocated for residential development. For each site allocated, site area, capacity, delivery timescales and the type of residential allocation is identified.

3.2 The subject site has not been allocated for any designated use according to the Policies Map as indicated in the extract at Figure 3.1 below:

Figure 3.1 Extract from Draft Policies Map

3.3 According to the Policies Map key, the site is located immediately adjoining, but outside the urban boundary (the red line) and within an area known as ‘Green Infrastructure’ (green dotted area). In this regard Strategic Policy SD2: Urban Boundary and Green Belt is relevant, as is Policy EN5: Green Infrastructure Networks.

3.4 Strategic Policy SD2 (Urban Boundary and Green Belt) confirms that all new development in the Borough will take place within the Urban Boundaries, defined on the Policies Map, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area. The explanation text to the policy further states that:

“The settlement boundaries set out on the Policies Map define the extent of the towns and villages within the Borough. Sustainable Development will normally be permissible in these locations subject to the policies of the Plan as a whole. Development in the countryside will be supported where it is for a use that needs to be located in this location. Examples would include farm diversification or certain types of tourism uses.”

3.5 Policy ENV5 (Green Infrastructure Networks) is written as follows:

“Development proposals will be expected to support the protection, management, enhancement and connection of the green infrastructure network, as identified on the Policies Map. Proposals which enhance the integrity and connectivity of the green infrastructure network will be supported. Development proposals should seek first to avoid or if not feasible, mitigate biodiversity impacts on-site. Schemes which would result in a net loss of green infrastructure on-site will only be permitted if:

- The loss resulting from the proposed development would be replaced by equivalent or better provision elsewhere (achieving an overall net gain in biodiversity offsite compared to that lost including long-term management proposals); and

• The proposals would not have an unacceptable impact on amenity, surface water run-off, nature conservation or the integrity of the green infrastructure network. Where practicable and appropriate, new green infrastructure assets incorporated into development proposals should be designed and located to integrate into the existing green Infrastructure network and should maximise the range of green infrastructure functions and benefits achieved.”

4. SOUNDNESS ASSESSMENT

INTRODUCTION

4.1 As mentioned in Chapter 2 above Paragraph 182 of the 2012 Framework deals with the examination of Local Plans. Local Planning Authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

4.2 In this section we consider the soundness of the Draft Local Plan Policies against the four key tests set out under Paragraph 182 of the 2012 Framework. It should be noted that for a Plan to be found sound it must comply with all of the four tests set out under Paragraph 182 of the Framework.

STRATEGIC POLICY HS2: HOUSING SITE ALLOCATIONS

POSITIVELY PREPARED

4.3 Table 1: Housing Site Allocations (page 19) of the Local Plan demonstrates that the Council’s identified housing supply is reliant of the delivery of several large sites, one of which as an example, is expected to deliver 400 houses in years 6 to 15 of the Plan period. This site is located in the Green Belt and its successful delivery is predicated on the demonstration of exceptional circumstances to enable the land to be released from the Green Belt (Policy H73 Edenwood Mill, Edenfield).

4.4 The delivery of this site is highly contentious and highly questionable and even if as little as 10% of the anticipated units are not delivered, (i.e. 40 units), it would result in a deficit in the Council’s housing land supply. At this point in time, the emerging Local Plan runs the very real risk of being out-of-date immediately on the point of adoption. There is no contingency within the Local Plan to allow for sites not coming forward at the anticipated rate.

4.5 With this in mind, the Local Plan in its current form is not positively prepared and the Council must identify additional land for the supply of housing. In that regard, the subject site is available and deliverable for housing in its entirety.

JUSTIFIED

4.6 Strategic Policy HS2 fails to plan for the proper growth of the Borough as it does not provide an adequate strategy to deliver the Council’s own identified housing requirement. The Local Plan is not justified as it will fail to deliver sustainable development and consequently it is unsound.

EFFECTIVE

4.7 As set out above, Strategic Policy HS2 as currently drafted will not be effective because it will not deliver the Council’s own identified housing requirement; the Local Plan will not be effective.

PROPOSED MODIFICATION

4.8 To be consistent with national policy, the Council is respectfully requested to allocate the site for housing under draft Policy HS2, and to extend the urban boundary so that the site is included within it.

5. PROPOSED HOUSING ALLOCATION: LAND SOUTH OF EDINBURGH ROAD, HELMSHORE

SITE CONTEXT

5.1 The land south of Edinburgh Road represents an opportunity to deliver truly sustainable residential development. As already highlighted the site is in single land ownership and is readily available for development. The extent of the area we request the Council allocate for housing is edged in red on the second page of the Title Plan contained in Appendix 1.

5.2 The site comprises unremarkable greenfield land located in the open countryside, but it immediately adjoins the urban area with a large existing residential area found to the immediate north, east and south. Access to the site would be taken from the end of Edinburgh Road.

5.3 In terms of topography, the site is subject to a gradient but simple mitigation measures could readily address this.

5.4 There are no environmental or statutory designations or other technical considerations that would prejudice the residential development of any part of the site.

STRATEGIC POLICY HS1: MEETING ROSSENDALE'S HOUSING REQUIREMENT

STRATEGIC POLICY HS2: HOUSING ALLOCATIONS

5.5 Draft Policy HS1 sets out the Council's approach to 'Meeting Rossendale's Housing Requirement'. It states that at least 3,180 additional dwellings will be provided over the plan period (2019-2034). In this context, land at Edinburgh Road could make an important contribution towards meeting the Borough's residential development needs in the early part of the Plan period as the site is available and deliverable.

5.6 It is noted that Strategic Policy SS: Spatial Strategy states the following:

"The Council will focus growth and investment in Key Service Centres, on major sites and on well located brownfield sites whilst protecting the landscape and current built character and rural areas. Greenfield development will be required within and on the fringes of the urban boundary to meet housing and employment needs. The Council will require that the design of such development relates well in design and layout to existing buildings, green infrastructure and services."

5.7 The subject site is located in Helmshore which is identified as a Rural Local Service Centre. Such settlements are described in the Local Plan (Page 9) as 'discrete settlements with links to Key Service Centres that serve their own residents and those in nearby villages with basic services and are able to provide for future local housing and employment needs.'

5.8 The Local Plan includes a single proposed housing allocation in Helmshore, that being Policy H74 as shown below:

Figure 5.1 Extract from Table 1: Housing Allocations of the Local Plan

5.9 According to the SHLAA Update 2018 (Site Reference: SHLAA16304), the site is in multiple ownership and comprises a mix of brownfield and greenfield land currently used as fields and a caravan storage yard. The site is identified as having a high landscape value and a number of technical constraints have been identified that may require mitigation and could have an impact on the developable area of the site and its delivery timescales. It is acknowledged that the SHLAA references that a housebuilder has an interest in the land.

5.10 On the Council's website is a document entitled 'Comments Received on the Rossendale Local Plan Regulation 18 Consultation 24 July 2017-09 October 2017. This document is accessed via a link entitled 'Main Report – Amended 14/08/2018'.

5.11 At Page 1076 of that document under Reference ID: 1764, comments submitted by Taylor Wimpey UK can be found. The submission states that Taylor Wimpey have sole control over a 6 hectare site at Grane Road, known as 'Grane Village' and have been working with the Council for a number of years to promote the allocation of the site for housing. Notably, the submission states:

"4.2 This representation has shown that the site is deliverable and developable in line with the NPPF and has also demonstrated its importance for housing delivery in Rossendale, representing over 4.4% of the total allocated dwelling numbers and will make a significant contribution to 5 year supply."

5.12 It is therefore clear that the Council is focusing all of the proposed development in the Rural Service Centre of Helmshore on a single, large site. Observation of the comments submitted to the Regulation 18 consultation highlights that there are serious concerns expressed by the local community with the proposed allocation and the impact that new development would have on the local highway network in particular. In light of the level of objections and the previously identified technical constraints, we believe it

is reasonable to conclude that the site may not deliver the expected number of 174 houses within years 1 to 10 of the Plan period. In the event that housing is not delivered at housing allocation H73 as anticipated, the Council would be required to find alternative, sustainable sites to allocate for housing in the Helmshore area. There is no contingency in the Local Plan for slow delivery. This Representation provides such an alternative.

SUSTAINABLE HOUSING ALLOCATION WITHIN THE URBAN AREA: LAND AT EDINBURGH ROAD

5.13 The site subject to this Representation is included in the Council's SHLAA Update 2018, being recorded as Site Reference SHLAA16300. The SHLAA concluded that the promoted area of land was available and achievable, but not suitable for the delivery of houses. The SHLAA entry is contained at Appendix 2 to this Statement.

5.14 The SHLAA highlights that the site is located well to most local services. It also makes the comment that the site is located 'far away from bus services', but a walk of less than 800m should not be considered an unacceptable distance to walk to a bus stop. The site is located at the end of road which serves an existing residential area where the existing residents would have to walk a similar distance to a bus stop. It is worth remembering at this stage that the site discussed in the SHLAA Entry comprised a much larger area than that promoted in this current Representation and therefore the smaller area would be more accessible than previously promoted.

5.15 This point is also important in terms of the urban boundary. The area of land promoted in this Representation is circa 0.63 hectares and would result in a much more discrete and sustainable extension of the urban boundary than previously submitted. The urban boundary would follow the reduced western boundary line, as shown at page 2 of Appendix 1, and would follow a clear and defensible boundary defined by the existing woodland. This defensible line is clear to see as shown in Figure 5.2 below:

Figure 5.2 An indication of how the urban boundary could follow the existing boundary defined by the existing woodland along the western boundary of the site

5.16 This Representation presents an opportunity to contribute to the delivery of sustainable housing over the Plan period, particularly in the first 5 years.

5.17 To conclude, for the reasons discussed above, in our view the land south of Edinburgh Road should be allocated for housing in the emerging Local Plan and the urban boundary amended so that the whole of the site is included within that boundary.

5.18 This would be in accordance with Paragraph 47 of the Framework which requires Councils to "significantly boost the supply of housing".

6. CONCLUSIONS

6.1 The starting point for consideration of the Council's draft Local Plan document is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 This Representation presents an opportunity to contribute to the delivery of sustainable housing over the Plan period. There would be no harm to the aims and objectives of the Local Plan to deliver sustainable development if the land south of Edinburgh Road were to be allocated for housing in the emerging Local Plan, and the urban boundary modified so that the whole of the site is included within that boundary.

6.3 The site is available and deliverable, and capable of being developed for residential purposes now, within the first five years of the Plan period.

Appendix 1 Title Plan - Location Plan

Appendix 2 SHLAA Entry: Reference SHLAA16300

SUGGESTED MODIFICATION

3.6 We support the aims of the Local Plan to identify key development sites which are central to the delivery of the overall strategy for new housing. We also support the principle of including a defined urban boundary as part of the Local Plan and shown on the Policies Map as this provides clarity on where the Council require new development to be directed.

3.7 However, we raise concerns over the Council's proposed housing allocations and their ability to deliver the identified housing requirement both within the 5-year and whole Plan period. To that end we request that a modification to the Local Plan be included to designate the subject site as a proposed housing allocation, and in turn to revise the alignment of the urban boundary to include the subject site within in.

3.8 Draft Policy HS1 sets out the Council's approach to 'Meeting Rossendale's Housing Requirement'. It states that at least 3,180 additional dwellings will be provided over the plan period (2019-2034). In this context, land at Edinburgh Road could make an important contribution towards meeting the Borough's residential development needs.

3.9 This would be in accordance with Paragraph 47 of the Framework which requires Councils “significantly boost the supply of housing”.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

New site

Reference **5192**

B&E Boys Ltd

Number of supporters:

Commenting on

Waterfoot Mills

New site

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

5. WATERFOOT MILLS – A SUITABLE SITE FOR HOUSING

5.1 Allocating the land to the south of the Waterfoot Mills for housing by way of an overall mixed-use allocation or separate housing allocation presents a very positive opportunity to redevelop the whole of the site in a holistic and strategic manner. Not only could the site contribute to the local economy through the retention and creation of employment uses, but the site presents the opportunity to contribute to the delivery of housing over the Plan period.

5.2 Policy HS1 within the Draft Local Plan identifies a net housing requirement for the period 2019 to 2034 of at least 3,180 additional dwellings, equating to 212 dwellings a year. The draft policy also seeks to deliver over 30% of new dwellings on previously developed land across the Borough.

5.3 The site is located in a sustainable location being close to a range of amenities to the south including a convenience store, post office and Waterfoot Health Centre for example. There are bus stops immediately to the north of the site and the Number 483 provides a regular service to Burnley and Rawtenstall. St Peter's Primary School, Waterfoot Primary School and Bacup and Rawtenstall Grammar School are all located adjacent to the site.

5.4 In this context, the Waterfoot Mills site could make an important contribution towards meeting the Borough's residential development needs. In particular, as it is recognised within the explanatory text that brownfield sites within the urban area are limited.

5.5 We support the aims of the Local Plan to identify key development sites which are central to the delivery of the overall strategy for new housing and this subject site could make a positive contribution to the delivery of housing in the Borough; a mixed use development would embody the aims of the Framework to meet the development needs of the area for both housing and employment.

5.6 Importantly, the site is in a single ownership, and the land owners are willing to have open discussions with the Council to deliver a really exciting project across the whole site which could make a key contribution to the sustainable growth of the Borough. The site in its current state is not financially viable, and as the existing buildings remain vacant and continue to fall into disrepair, the situation is only going to be exacerbated. The flexibility of a Mixed-Use Allocation or additional housing allocation would enable a more sustainable approach to the future protection and development of the site at Waterfoot Mills.

5.7 There is potential for a Development Brief to be drafted for the redevelopment of the site to encourage key stakeholders, the land owner and the Council to work together for the benefit of the site itself, the immediate environs in Waterfoot, and to the benefit of the local economy in Rossendale Borough.

CONCLUSIONS

5.8 It has already been described how each of the distinct areas which form the Waterfoot Mills site are only partly occupied by commercial and industrial operators and employers. The site does not operate on a financially viable basis, but the land owner is committed to retaining existing tenants where possible and attracting new employers through the creation of additional floorspace. However, there are deficiencies with many of the existing buildings and the associated environs which prohibit the site being fully occupied for solely employment use.

5.9 This Representation has set out how there is an exciting opportunity for the site to make a contribution to the continued retention of existing employment floorspace, the creation of new employment floorspace, and the delivery of new housing over the Plan period and beyond.

5.10 This subject site comprises previously developed land, within the Urban Boundary, in a sustainable location and therefore would accord with the principles of sustainable development as set out in the Framework.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5193**

Brilie Properties Ltd

Number of supporters:

Commenting on

New site

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

5. PROPOSED HOUSING ALLOCATION: WAVELL HOUSE

DRAFT POLICY HS1 – MEETING ROSSENDALE’S HOUSING REQUIREMENT

5.1 Draft Policy HS1 sets out the Council’s approach to ‘Meeting Rossendale’s Housing Requirement’. It states that at least 3,180 additional dwellings will be provided over the plan period (2019-2034). The draft policy also seeks to deliver over 30% of new dwellings on previously developed land across the Borough.

5.2 In this context, land at Wavell House could make an important contribution towards meeting the Borough’s residential development needs, particularly as it is recognised within the explanatory text that brownfield sites within the urban area are limited. This would be in accordance with Paragraph 47 of the Framework which requires Councils to “significantly boost the supply of housing”.

SUSTAINABLE HOUSING ALLOCATION

5.3 The site is very sustainable being brownfield land located in the urban boundary and within easy access to a range of amenities. In allowing an appeal for 74 dwellings on the opposite side of Holcombe Road to the east of the site³, the Inspector dealt with the sustainability credentials of that site as follows:

“9. The site lies on the western limits of the built up area in the valley adjacent to the Ogden river. The land rises to the east to what appears to be the centre of the settlement at the roundabout crossroads of Helmshore Road and Gregory Fold/Broadway with its shops and schools nearby. There is a convenient footpath to the north of the site linking the site to Gregory Fold. It is only a short 5-10 minute walk to the shops/primary schools. The National Cycle Route 6 adjacent to the eastern boundary of the site means journeys by bicycle are also convenient. Access to these facilities by road is, however, rather more circuitous. It involves travelling south on Holcombe Road before turning north at the B6214 Helmshore Road.

10. For a short stretch the footpath to Gregory Fold is rather steep and this would discourage journeys on foot to the shops/schools by some people who are either unable or unwilling to tackle the slope. However there is also a shop along Holcombe Road which can be reached without any steep inclines and the No.11 bus would provide access by public transport (a couple of minutes ride) to those facilities on higher ground and also to the wider bus network operating along Broadway and Helmshore Road.

11. In addition, information provided by the appellants indicates a range of services/employment is available within easy reach of the appeal site which can be accessed by a variety of means of transport and those which are not, such as health facilities and a supermarket are within a reasonable travel distance in Haslingden. It has been said that health facilities and the like are oversubscribed, but no empirical evidence was submitted to the inquiry to substantiate that view.

12. The Council’s Interim Housing Policy 2010 encourages the provision of housing within the defined urban area of Haslingden (which includes the appeal site) if, amongst other things, the development would reuse brownfield land, would contribute to affordable housing and would be built at an appropriate density. The appeal scheme satisfies these criteria. It uses previously developed land and would provide 15 affordable units and would have a density of 34dph.

13. The combination of the above leads to the conclusion that because the site is a brownfield one within the built up area which has reasonable access to a variety of goods and services by different modes of transport, its redevelopment would, in principle be, acceptable for residential development.”

5.4 The same conclusions on sustainability grounds should be reached in relation to the Wavell House site. As mentioned previously, it should be noted that the entire site could be converted to residential use under Permitted Development rights subject to a Prior Approval procedure. However we would prefer for the site to be allocated for housing to allow a flexible redevelopment of the site.

5.5 The site is not identified in the SHLAA 2018 Update. There is a reference to Wavell House (SHLAA16298) in Table 1 as a site being excluded due to having planning permission. However, it is assumed that this relates to the adjoining site to the north which benefits from Prior Notification Approval to be converted to apartments.

ILLUSTRATIVE LAYOUT

5.6 The below illustrative layout shows how the site could be redeveloped for housing. This demonstrates that 14 dwellings could comfortably be delivered within the site with

access taken off Holcombe Road.

Figure 5.1 Illustrative Layout for residential development at Wavell House.

DELIVERABILITY OF DEVELOPMENT

5.7 Once the existing tenants leave the site at the end of the year, the site will be available for development, subject to the employment allocation being removed.

5.8 As discussed above the site is suitably placed to access shops and services on foot, by cycle and by bus thereby helping to reduce reliance on a car.

5.9 There are no environmental or statutory designations or other technical considerations that would prejudice the residential development of the site.

5.10 To conclude, for the reasons discussed above, in our view the site at Wavell House should be allocated for housing in the emerging Local Plan.

6. CONCLUSIONS

6.1 The starting point for consideration of the Council's Local Plan is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 The Framework is clear at Paragraph 22 that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Paragraph 160 outlines the importance of local planning authorities having a clear understanding of business needs within the economic markets operating in and across their area.

6.3 It has been highlighted in this Representation that the Wavell House is going to become vacant with Rossendales terminating their lease at the end of 2018. As a result, and in order to futureproof the site, removal of the proposed employment allocation is recommended, and a residential allocation should be considered in order to promote sustainable residential development. Land at Wavell House has an opportunity to contribute to the delivery of housing over the Plan period on a site which comprises previously developed land within the Urban Boundary.

6.4 In conclusion, Local Plan Policy EMP2 should be modified to remove reference to EE20 Wavell House and the site should be allocated for housing for up to 16 dwellings under Policy HS1. The Proposals Map should be amended to reflect this

6.5 The site is available, deliverable and achievable, subject to the above provisions.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5194**

Brother Investments Ltd

Number of supporters:

Commenting on

Forest Mill

New site

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

5. PROPOSED HOUSING ALLOCATION: FOREST MILL

SITE CONTEXT

5.1 The site at Forest Mill represents an opportunity to deliver truly sustainable residential development.

5.2 The site is in single land ownership, being solely within the ownership of our client. The site is located on Burnley Road East, roughly 7.5km to the north east of Rawtenstall. It is dominated by a three storey mill building which is positioned at the back of the pavement on Burnley Road East.

DRAFT POLICY HS1 – MEETING ROSSENDALE’S HOUSING REQUIREMENT

5.3 Draft Policy HS1 sets out the Council’s approach to ‘Meeting Rossendale’s Housing Requirement’. It states that at least 3,180 additional dwellings will be provided over the plan period (2019-2034). The draft policy also seeks to deliver over 30% of new dwellings on previously developed land across the Borough.

5.4 In this context, the Forest Mill site could make an important contribution towards meeting the Borough’s residential development needs. In particular, as it is recognised within the explanatory text that brownfield sites within the urban area are limited.

SUSTAINABLE HOUSING ALLOCATION

5.5 The site is located in a sustainable location being close to a range of amenities. There are bus stops immediately to the south of the site and the Number 483 provides a regular service to Burnley and Rawtenstall.

5.6 Water Primary School is located adjacent to the site on the opposite side of Burnley Road East. A convenience store and public house is located to the north roughly 500m from the site.

SHLAA 2018 UPDATE

5.7 The site is included in the SHLAA 2018 update under reference SHLAA18424 (see Appendix 1). This concludes that the site is developable in the medium term (within 6-10 years) and can deliver 16 dwellings.

SUMMARY

5.8 The Representation presents an opportunity to contribute to the delivery of sustainable housing over the next 15 years, i.e. during the current Plan period, or beyond. The subject site comprises previously developed land, within the Urban Boundary, in a sustainable location and therefore would accord with the principles of sustainable development as set out in the Framework, for which there is a presumption in favour of.

5.9 To conclude, for the reasons discussed above, in our view the site at Forest Mill should be allocated for housing in the emerging Local Plan.

6. CONCLUSIONS

6.1 The starting point for consideration of the Council’s Local Plan is the well- established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 The Framework is clear at Paragraph 22 that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Paragraph 160 outlines the importance of local planning authorities having a clear understanding of business needs within the economic markets operating in and across their area.

6.3 It has been highlighted in this Representation that the site at Forest Mill is no longer appealing to modern businesses and indeed there has been a notable loss of tenants in the building in recent months. The site is poorly located for an employment use and this is backed up by the Council’s Employment Land Review 2017 which concludes that the site is “Poor”.

6.4 As a result, and in order to future-proof the site, removal of the proposed employment allocation is recommended, along with consideration of the site for sustainable residential development. Land at Forest Mill has an opportunity to contribute to the delivery of housing over the Plan period on a site which comprises previously developed land within the Urban Boundary.

6.5 In conclusion, Local Plan Policy EMP2 should be modified to remove reference to the Forest Mill site to allow a more flexible approach for redevelopment of the site over the plan period. Further, the site should be considered for allocation under draft Policy HS2 for residential development.

Appendix 1 SHLAA 2018 Update Extract

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Site not allocated

Reference **18 Mr Kenneth Howieson** - Number of supporters:

Commenting on - Loveclough Site not allocated

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

There is a parcel of land privately owned by a local resident which has had a previous planning application rejected and it has been dismissed as potential building land during this consultation. With the shortage of viable building land in this area, this parcel having been previously graded 1 and deliverable within 5 years, it should have been included.

The local council have approached the owner of land next to it to apply for his land to be included yet it has never been assessed nor had an application on it yet is exactly the same type of land in the same area. I lack understanding and therefore there is no soundness to why the council have not included my land in the house building land available in the area.

Include the land, it will be built on and help fill the shortage and of housing.

Do you wish to participate to the Examination In Public? **Yes** Reasons **I can state my case better**

Reference **70 Mr Anthony Brennan** - Number of supporters:

Commenting on - Site not allocated Site not allocated

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

I believe this location totally unsuitable for housing development for the following reasons. 1The access to the land is through a conservation gateposts which are very narrow . The entrance of the very busy Newchurch rd on a blind bend with bus stops on both sides of the road. This will increase the likelihood of serious accidents in gaining access &egress from road& lane for all vehicles .The area is a well used recreational place by school children ,dog walkers , fell runner's and the general public .It is a little oasis of trees , wild fruit Bush's , hedgehogs, Fox's numerous native birds & Bats that would be lost forever .Too many of what is supposed to a place to visit & enjoy are being destroyed by unsensetive schemes that could be built in more appropriate places .Rossendale borough council say they are trying to attract tourism too the valley ! What too see housing developments? I hope you can see the value in keeping this small oasis out of the local plan yours optimistically Anthony Brennan a proud father who has brought up his family in the lovely Rossendale valley & hope's others can enjoy the same.

Subject!
Objection to land at Higher Cloughfold being included in Local Plan.

Dear Sirs,
I believe the above area should not be in the local plan for the following reasons.
The area can only be accessed from the very busy Newchurch Rd through a narrow gap in a wall that is part of the conservation area. If dwellings are built here it would increase traffic entering and leaving the single lane access, which would no doubt increase the likelihood of a serious accident as there are bus stops on both sides of the road and a blind bend only metres away.
The area is a little oasis of native trees, wild berry bush’s with rural not urban wildlife such as hedgehogs, rabbits, fox’s, even the odd Roe Deer, many species of our birdlife nest in the tree’s, including bats.
The area is enjoyed by many school children who pass through on their way to and from school away from the busy Newchurch Rd, it is also used by many dog walkers, fell runners and local children who can play safely away from roads and cars.
If this area is built on it would be gone and lost forever in return for a small amount of monetary gain to a council is always saying it is trying to attract visitors and promote tourism too are valley, visitors which want to see nice area’s, and enjoy our wonderful views not housing developments. I am a proud father who has raised my family in the valley and this particular area and hopes that future generations can do the same, too much of our natural beauty is being eroded by what developers say are only small projects. I ask you take time to consider my points when making your decision.
Yours expectly,
A C Brennan

-
Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **94 Mrs L Bower** - Number of supporters:

Commenting on - HS2 Site not allocated

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

5. Objection to Policies SD2 and HS2 – Omission of Land south of Hollin Lane

5.1 We object to the omission of the land at Hollin Lane (site ref: SHLAA16184) and its exclusion from the urban boundary.

5.2 The site was allocated in the Part 2 Local Plan in 2015 as well as the Regulation 18 Local Plan in 2017. Representations were made at both stages supporting the allocation. Copies are enclosed as Appendix 3.

5.3 However the site is not allocated in the current version. We had no contact from the Council on the site or its intended removal from the plan. Having contacted the Council we were advised that the site was removed as an allocation from the local plan due to site access issues. However at no stage were we advised that this was an issue or a request that we provide further information to address any concerns. The allocation at the previous stage was based on the same access arrangements and therefore we see no justification for the site's exclusion at this stage. Indeed the access arrangements have not changed from those when the site was allocated for development, along with the land to the north of Hollin Lane (SHLAA Ref: SHLAA16392). The land to the north is not in the control of our client but what is clear is that until this late change Hollin Lane was deemed appropriate to both sites to deliver circa 51 dwellings (HS2.44).

5.4 Our client has agreement from LCC Highways on the access and the following is attached:

- Appendix 4 is the plan that is approved in principal;
- Appendix 5 is the written approval from LCC; and,
- Appendix 6 is an up to date letter confirming that the verges are part of the adopted highway enabling the work to be carried out as per the approved plan.

5.5 We have seen no evidence that the site cannot be accessed or any evidence that contradicts the written agreement of LCC. We note that the Highway Capacity Study was only published on 2nd October 2018, some 3 days before the consultation closes. That in itself raises an issue with the lawfulness of the consultation. For this site there is no reference to Hollin Lane in any event to contradict the agreed position with LCC.

5.6 The extract of the SHLAA is Appendix 7. This confirms that subject to access, the site is suitable, available and achievable. The Justification states:

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

5.7 As noted earlier access is agreed and the Council has proceeded on an erroneous basis. We can confirm that the site is capable of making a full contribution to housing land supply in the borough in the short term. It is located in an accessible location adjacent to the settlement boundary, and is surrounded by residential development to the west and partly to the north, a farm complex to the east, and a brook runs along the southern boundary with Alder Grange Community College to the south. The site represents a logical rounding off opportunity. A number of trees and planting is located along the brook, and would form the basis of a defensible urban boundary as part of a landscaping scheme.

5.8 Our client controls the site and we can confirm that it is achievable and immediately available for development. They are in active discussions with developers in order to bring the site forward. The site is considered to be suitable for development, and there are no technical or environmental constraints. Further detailed site specific work would be considered further as part of any future application.

5.9 We therefore request its reinstatement as an allocated site.

We therefore request our client's site is reinstated as an allocated site.

Do you wish to participate to the Examination In Public? **Yes** Reasons for the reasons set out for SD2

Reference	5197 Mr	Marcus	Hudson	Lancashire County Council	Number of supporters:
Commenting on				Site not allocated	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>BANKSIDE LANE, BACUP - HS2:11, 12, 13 and 32 proposes to allocate land which could result in 137 new dwellings off Bankside Lane which is an unclassified road approximately 1.1km in length varying in width and gradient with several pinch points and heavy on-street parking. To the west of its junction with Thistle Street, Bankside Lane provides the sole access to circa 150 dwellings.</p> <p>The existing layout on Bankside Lane is broadly reflected on the 1845 historic map and would not be considered acceptable under the current standards. The land to the west of Bankside Lane is at a higher level than the road which results in high retaining structures and there are buildings on both sides of Bankside Lane at several points which abut the road with no footway provision. Where there is footway provision, the widths are sub-standard along most sections. There appears to be little opportunity for improvement works to the current road layout within the extents of the adopted highway.</p> <p>Standards would seek a secondary / emergency access to be provided where more than 100 houses are proposed off a sole access such as Bankside Lane. Therefore any development land allocated off Bankside Lane should provide a secondary vehicle access point onto the highway network. The topography of the land presents difficulty in providing a suitable access route and it appears unlikely a secondary access could be achieved. Consequently we would have concerns about these sites and the ability to provide a safe and suitable access in accordance with the National Planning Policy Framework (NPPF) and adequate permeability for traffic distribution in accordance with Manual for Streets.</p> <p>There are also some site specific concerns:-</p> <p>HS 2:11 – There is insufficient width at the proposed site access and visibility at the junction of the site access and Bankside Lane cannot be achieved.</p> <p>HS 2.12 – The visibility at the site access and Bankside Lane cannot be achieved and there is insufficient road space to provide a suitable swept path for a large vehicle e.g. refuse wagon. There is currently on-street parking present and we would not support the introduction of parking restrictions on Bankside Lane at this point as there are residents who have no alternative off-street parking provision.</p> <p>HS 2.32 – Subject to the provision of a secondary vehicle access to the site being provided (Lodge Lane has been reviewed and discounted due to its narrow width over a significant length and gradient), this site could be considered acceptable. A pedestrian and cycle link to Osbourne Terrace would be necessary to support the sustainability of the site and provide a suitable walking distance to the nearest bus stops on Newchurch Road , the local Primary School and food shop.</p> <p>TONACLIFFE, WHITWORTH - HS2:106 and 109 – The sustainability of the sites is considered to be low and improvements to the pedestrian and cycle links would be required. There are ongoing concerns on Tonacliffe Road raised by the residents in relation to vehicle speeds and therefore mitigation measures to reduce vehicle speeds in accordance with the speed limit may be required.</p> <p>The sites could be deemed acceptable subject to a design being in accordance with Manual for Streets which provides maximum permeability and loop roads for multiple vehicle access points off the adopted highway network, rather than extensions of cul-de-sacs.</p> <p>HS2.54 – The vehicular access appears limited to Dobbin Lane with a potential pedestrian/cycle access via Co-operation Street. The access may be considered suitable to accommodate a limited number of houses, however the 55 houses that are proposed appears unlikely to be feasible. Further detailed design is required.</p> <p>HS2.66 – Vehicular access is limited to the access points as detailed above for HS2.64 and therefore is unsuitable. Vehicular access via Unity Way would require access through LCC owned land (Crest Moor Childrens residential home). The additional vehicle movements are unlikely to be supported by the Highway Authority due to the existing vehicle and pedestrian movements on Unity Way in connection with the 2 primary schools, children's home and employment site.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference **5220 Miss**

G

Moscrop

Number of supporters:

Commenting on

HS2

Site not allocated

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Subject

Objection to land at Higher Cloughfold being included in Local Plan

Dear Sir,

In my opinion the above area should not be in the Local Plan. The reasons are

- 1)The access is not suitable from Newchurch Road. The gate posts are too narrow to get on to Newchurch Rd. When trying to get out there are one bus facing, and one bus stop to the left and a shop to contend with and a bad bend which would increase the chances of there being a lot of accidents.
- 2)The area is a lovely wooded area which many people come to daily. Some just come walking other walking there dogs. It also an area which the children cut through to school to keep them off a busy road.
- 3)The wild life in this area has many birds, rabbits and doors which would be lost if a development is allowed to go ahead.
- 4)The future generation can do the same as my generation and enjoy this wooded area. If not adopted into the urban plan.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section 505

Comments on policy HS03

Edenfield

Reference	101 c/o Agent	c/o Agent	c/o/ Agent	The Methodist Church	Number of supporters:
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Commenting on - HS3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Please see attached statement prepared by Nexus Planning (including Development Statement and Illustrative Masterplan in relation to Site H72: Land West of Market Street, Edenfield)

6.0 Policy HS3: Edenfield

6.1 The Methodist Church are fully supportive of the proposed strategic housing development at Edenfield (Housing Allocation H72: Land West of Market Street).

6.2 As set out in our representations to SD2: Urban Boundary, we support the Council's case that 'exceptional circumstances' exist to justify the proposed release of Green Belt land to meet development needs over the plan period.

Allocation to Edenfield

6.3 In terms of the proposed allocation dwellings to Edenfield, it is with regard to the following evidenced reasons that the Council are justified in directing this scale of development to Edenfield through Housing Allocation H72: Land west of Market Street. The allocation is justified and will ensure the effective delivery of the Local Plan. As such, it can be considered 'sound' in accordance with paragraph 35 of the Framework.

Housing Need

6.4 The evidence base prepared to support the Local Plan demonstrates that the Council have examined all other reasonable options for meeting its identified need for development (in accordance with Paragraph 137 of the NPPF). The SHMA also clearly points towards the need to accommodate housing growth in the south of the borough and specifically in Edenfield. Affordable Housing needs are also particularly acute in this area of the borough, with Tables 8.2 and 8.3 of the SHMA confirming that the Helmshore & Edenfield sub area has the highest proportion of both existing and newly formed households unable to purchase market housing. There is insufficient land available within the existing settlement boundary of Edenfield to accommodate this affordable housing need.

Suitability and Sustainability of Edenfield

6.5 The Strategy Topic Paper (2018) provides more information regarding the hierarchy of settlements in Rossendale. The Appendix of the document distinguishes between different 'levels' of settlement based on their facilities and public transport connections. Rawtenstall is recognised as the primary centre, with Bacup, Haslingden and Whitworth below - recognising their role as the main settlements within their immediate catchment area. Below this, Waterfoot and Crawshawbooth are identified as 'Level 2' settlements and Edenfield, Helmshore, Stacksteads and Rising Bridge as 'Level 3' settlements. The draft Local Plan then goes on to identify all those settlements identified as 'Level 2 and 3' as 'Local Service Centres'. This approach recognises the intertwined nature of the settlements in Rossendale, which often follow the linear form of the valleys. It shows how with regard to existing services and facilities, Edenfield is among the most sustainable settlements in the Borough, below Rawtenstall and the Key Service Centres.

6.6 In addition to the facilities within Edenfield itself, it is important to consider how Edenfield is closely related to Bury to the south, and Greater Manchester beyond, with regular direct bus services to Bury Interchange approximately 25 minutes away. It is well related to the strategic network – having easy access to the A56. The centre of Ramsbottom is also located approximately 3 kilometres away and provides a range of higher order services including a Morrisons supermarket and Tesco Superstore. Ramsbottom is also accessible by frequent bus services from Edenfield.

6.7 In consideration of the above, Edenfield represents one of the most sustainable locations to accommodate new housing, with regards to access to local facilities and public transport links.

Environmental Suitability

6.8 As set out elsewhere in our representations, and throughout the Council's evidence base, Rossendale faces several physical and environmental constraints to development, particularly in the form of topographical make-up, flood risk and environmental designations. As we go on to demonstrate, H72: Land West of Market Street does not face any severe constraints to development such that it can accommodate housing without unacceptable harm to the environment or character of the wider environment. It is recognised that the proposed development will fundamentally alter the existing character of the site, and would result in a significant growth of the village of Edenfield. However, the Council's evidence base shows how with regard to the physical characteristics of the site, the proposed development would not cause harm to the wider, fundamental character of the settlement or this part of the Borough.

6.9 We take the opportunity below to reinforce these findings below and in the appended Development Statement, with reference to the technical surveys and assessments of the site undertaken on behalf of the Methodist Church.

Viability

6.10 The Green Belt Topic Paper (2018) describes how it is vital to ensuring an effective and deliverable development strategy that the Local Plan directs a proportion of the housing allocations towards higher value areas. Edenfield is one such area. Through these representations we can confirm that the landowners are confident that land west of Market Street represents a viable and deliverable site for housing, which will come forward for development in the plan period. Furthermore, we can confirm the site is able to support the provision of affordable housing and a mix of house types and sizes in to help redress the current imbalance in house types as identified in the evidence base. The development will also be able to support other local infrastructure improvements in line with policy requirements.

Availability and Suitability of Strategic Site

6.11 The Council is right to recognise this site as an important opportunity within the Borough to bring forward a significant proportion of the housing requirement on a single site of a strategic size. The size of the site presents the opportunity to plan for the growth of Edenfield in a comprehensive manner – ensuring high quality design, the inclusion of a good range of dwelling types and sizes. In delivering a critical mass of development, the site will be able to support the provision of planning contributions and infrastructure delivery to support the new development and ensure the future sustainability of Edenfield.

Deliverability and Suitability of Land off Exchange Street

6.12 To support the promotion of the site and confirm its deliverability for housing, the Methodist Church have commissioned a suite of technical survey work to understand the physical considerations to developing the site. The findings of this survey work is summarised within the Development Statement contained in Appendix A. The Development Statement also provides a Constraints and Opportunities Plan and Illustrative Masterplan of the site. It also contains a Combined Illustrative Masterplan prepared jointly by the landowners of H72 to show how the wider allocation would work as one integrated site. This Combined Illustrative Masterplan is also provided in Appendix B.

6.13 We provide a summary of the key technical constraints associated with development of land off Exchange Street below.

6.14 Landscape Impact: The Council's Landscape Assessment of H72 'Lives and Landscapes Assessment – Volume 2: Site Assessments' (July 2017) concludes that subject to suitable mitigation measures, the majority of the site is suitable for development from a landscape point of view. The Study identifies the most sensitive part of the wider allocation H72 is in the north.

6.15 Under the Assessment, the Site was divided into separate areas, with the land owned by the Methodist Church ('land off Exchange Street') being identified as Area D. The Assessment describes how Area D is enclosed by mature trees to the north and west and by the boundaries of neighbouring properties to the south. It concludes that Area D could be 'developed sensitively and incorporated successfully into the village boundary' taking account of recommended mitigation measures.

6.16 The Combined Illustrative Masterplan now submitted shows how the mitigation measures recommended for land off Exchange Street in the Lives and Landscape Assessment can be incorporated into the scheme. These can be incorporated into the final agreed Masterplan/ Design Code for the site as required under draft Policy HS3:

- The existing trees on the site are to be retained;
- New areas of open space/ landscaping and tree planting created alongside the stream to the south of the site;
- The existing pedestrian access from Woodlands Road is to be retained and pedestrian links enhanced across the site to encourage access to the woodland and to the public footpath network in the surrounding countryside;

- The existing track to Chatterton Hey is retained and the hedgerow can be incorporated into the development;
- The positioning of development parcels responds to the natural topography of the site and long views towards Peel Tower can be retained;
- The new dwellings around the existing recreational field will front onto it to create a positive sense of place and engender natural surveillance.

6.17 Overall, whilst the development will result in the loss of existing greenfield land and will change the immediately surrounding environment, the technical work undertaken shows how land off Exchange Street has low landscape sensitivity and the development can be successfully incorporated with the existing village without adverse impact on the wider landscape.

6.18 Green Belt: As set out elsewhere in our Representations to the Local Plan, we strongly support the Council's case that 'exceptional circumstances' exist to justify the release of Green Belt for development, including within Edenfield.

6.19 The Council have undertaken a thorough assessment of the Green Belt across the Borough (Green Belt Review, November 2016). This identified land to the west of Market Street (site H72) as the only land around the edge of Edenfield which would be 'potentially suitable' for release from the Green Belt, without causing harm to the purposes or integrity of the wider Green Belt in Rossendale. The Green Belt Review found that the site performed weakly in Green Belt terms, partly because it is contained by the A56 which forms a strong physical and visual barrier.

6.20 The Development Statement contained in Appendix A considers the findings of the Green Belt Review in relation to the Church's parcel of land (land off Exchange Street) specifically. The Review describes how 'releasing this parcel is unlikely to have a substantial negative effect on the integrity of the wider Green Belt'.

6.21 In its consideration of the land to the north (Parcels P43 and P39), the Review recognises that 'the planned release of parcel P44, P43 and then P39, in that order, could be perceived as the main block of settlement within Edenfield growing incrementally north and filling the gap between the A56 and the linear settlement along Market Street. This could create a stronger Green Belt boundary and settlement edge.'

6.22 We support strongly support the Council's recognition in the evidence base that the strong and defensible boundaries of the A56 and the existing development along Market Street presents a key opportunity to release a well contained area of Green Belt which makes only a limited contribution to the purposes of the Green Belt. With regard to the five purposes of the Green Belt set out in paragraph 134 of the Framework, the development of the land west of Market Street (H72) will:

- a) not result in unrestricted sprawl of the existing built-up area by virtue of the existing strong barrier of the A56;
- b) not result in the merging of settlements, since the development will extend no further north than the existing edge of the settlement of Edenfield which stretches north along Market Street/ Burnley Road. The gap between Edenfield and Rawtenstall will therefore be retained;
- c) be experienced as an incremental expansion of development on land which is already closely related to the existing urban edge which runs along the entire eastern boundary. The A56 on the other side contains the site meaning the development would not amount to an encroachment into the countryside surrounding the settlement;
- d) not have any significant impacts on the setting of the historic settlement of Ramsbottom;
- e) not harm the prospects of recycling urban land within the Borough since a thorough review undertaken to inform the Local Plan has demonstrated there are insufficient existing urban sites to meet the growth required over the entire Plan Period.

6.23 Heritage: The nearest Conservation Area to the site is the Chatterton/ Strongstry Conservation Area to the west. The Site has no association or visual connection with the Conservation Area by virtue of the A56 and area of dense woodland in the south-western part of the site, which provides a strong visual barrier. In Edenfield itself, the Grade II* Listed Edenfield Parish Church lies to adjacent to the eastern boundary of the northern part of the wider allocation. The Combined Illustrative Masterplan shows that through careful design, the setting of the Church will be preserved.

6.24 Accordingly, it is confirmed that the site presents an opportunity for development without causing harm to any designated heritage assets. The Heritage Impact Assessment of Housing and Employment Sites (August 2018) produced by the Council to inform the Local Plan concludes that the development of the site is acceptable in heritage terms, subject to appropriate mitigation measures.

6.25 The heritage and character of the existing village will be reflected through the architectural detailing and choice of materials in the new development. This can be secured through the Design Code.

6.26 Highways: CBO Transport have been commissioned to advise in relation to access to land at Exchange Street specifically. They have confirmed that access can be provided for the proposed residential development of the Church's land via Exchange Street. The existing carriageway width on Exchange Street is 5.5 metres which is a standard width for a residential road and would pose no constraint to the proposed development of the site. There is an existing footway along the south side of Exchange Street which provides pedestrian connectivity between the site and the village centre.

6.27 The Council published a Highways Capacity Study on the 2nd October 2018, which looks at the impact on the strategic road network. The joint landowners will be reviewing this document and providing further comment in due course.

6.28 Flooding: The entire site is located within Flood Risk Zone 1 with reference to the Environment Agency flood maps. Residential development would therefore be entirely acceptable in line with national guidance on flood risk. Hydrock have been instructed to prepare a Flood Risk Assessment, which confirms that the proposed development of the site would not give rise to increased flood risk elsewhere. It has also been demonstrated that adequate drainage for the site could be designed in a manner which utilises the natural topography of the site and incorporates sustainable drainage systems.

6.29 Ecology: The Methodist Church has commissioned Appletons to undertake an Ecology Survey of land off Exchange Street. This confirms that the majority of habitats on the site are common and of limited value. The existing trees and woodland do however provide opportunities for wildlife. The woodland and majority of trees will be retained and incorporated as part of any future development and the Ecology Appraisal submitted to support these representations recommends measures to enhance the retained woodland and achieve a net gain for biodiversity as a result of the development.

6.30 Overall, given the nature and location of the site, there are not anticipated to be any overriding constraints to its development in terms of ecology and development on the site can come forward in a manner which provides appropriate mitigation and biodiversity enhancements in line with local and national policy.

6.31 Pollution: In recognition of the site's location adjacent to the A56, the Methodist Church have commissioned consultants Hydrock to assess the suitability of the site for development in terms of the existing acoustic environment. The Acoustic Assessment confirmed how the part of the site at Exchange Street proposed to be developed, is predicted to fall into the 'low' and 'medium' risk categories for noise impacts from the A56. Accordingly, it confirms that subject to the incorporation of suitable mitigation measures in the detailed design process, the site can be considered suitable for housing development from a noise impact perspective.

6.32 Hydrock have also undertaken a Ground Conditions Desk Study. The overall risk from land contamination at the site is considered to be low, as the area of the proposed housing development has remained an undeveloped field throughout time.

Comments on HS3 Draft Policy Wording

6.33 The Methodist Church welcome draft Policy HS3. Overall, we consider the Policy sets out clear requirements for the delivery of the site providing certainty for the Council, the developers and the local community whilst retaining a degree of flexibility to ensure the Policy can adapt to changing circumstances over the Plan period. The requirement of a Masterplan for the site enables detailed decisions about the nature of the development to be undertaken at an appropriate point in the future, through discussion with the Council and the local community. We therefore consider draft Policy HS3 to be positively prepared, justified and effective in ensuring the proposed allocation represents high quality development. The Policy is therefore considered to be 'sound' in accordance with the tests set out in Paragraph 35 of the NPPF.

6.34 We set out below our specific comments on each element of the draft Policy.

Part a) of Policy HS3 requires that comprehensive development of the entire site is demonstrated through a masterplan;

6.35 The Methodist Church can confirm their commitment to work together with the other landowners of Site H72 to ensure that a combined and comprehensive approach is taken in respect of the whole allocation. The landowners have worked together to understand the technical constraints and produced a Combined Illustrative Masterplan for the whole site.

6.36 This shows how the site can come forward comprehensively to deliver a high quality and attractive development which respects and will deliver benefits to the existing settlement.

6.37 The Methodist Church is committed to working with the other landowners in partnership with the Council and other relevant stakeholders, including the local community in and around Edenfield in the development of the masterplan.

Part b) of draft Policy HS3 requires the implementation of the development in accordance with an agreed Design Code. It sets out key design principles for the whole site that will be incorporated in the Design Code;

6.38 The Methodist Church can confirm that the design principles set out under part b) will be implemented through the detailed design of the scheme. The Combined Illustrative Masterplan contained in the Appendix B demonstrates how several of the key design criteria can be incorporated.

6.39 In accordance with Part b) c) of the Policy, the Combined Illustrative Masterplan demonstrates how green infrastructure will be incorporated through the development to build upon the existing green infrastructure – for example the woodland area around Chatterton Hey - creating ecological linkages across the site, and ensuring an appropriate relationship with the surrounding uses. For example, the Illustrative Masterplan shows a significant landscape buffer between the new dwellings and the A56. It also shows the enhancement of landscaping to preserve the setting of the Church, as well as the potential for open green space along the frontage of Market Street.

6.40 In accordance with Part b) d) the Combined Illustrative Masterplan shows how the existing public rights of way crossing the site will be retained and new linkages created across the site providing connections with the centre of the village and the surrounding countryside.

6.41 In accordance with Part b) n), it has also been demonstrated how new development will be off-set from Edenfield Parish Church by a considerable landscape buffer. The existing woodland surrounding the Church to the south and north lies outside of the boundary of the allocation. As such, it will remain untouched as a result of the development and there will be limited impact on the setting of the Church. In accordance with Part b) p) new development is shown as fronting onto the existing recreation ground to create natural surveillance and create a positive senses of place, helping to integrate the development will the rest of the village.

6.42 In terms of the requirement for Primary School provision, as set out in Part b) q), the supporting text to Policy HS3 confirms that the Education Authority's preferred course of action would be to expand Edenfield School onto adjacent land. There is no evidence that this would not be possible and as such at this stage it is anticipated that the development at H72 would make contributions to support the future expansion of the Primary School.

Part c) of the Policy requires a phasing and infrastructure delivery schedule for the area;

6.43 The technical work undertaken so far confirms that the infrastructure requirements established under this policy can be provided as part of the scheme. We scheme will comply with policies requiring affordable housing and public open space.

6.44 The submitted technical information and Combined Illustrative Masterplan indicates how the above elements can be incorporated within the overall scheme and secured through a phasing and infrastructure delivery schedule.

Part d) of the Policy required an agreed programme of implementation in accordance with the masterplan;

6.45 The Methodist Church can also confirm their willingness to commit to a programme of implementation for the development. These representations and the supporting documents, confirms that there is nothing preventing the development of the land off Exchange Street for housing within the next 5 years.

6.46 This part of the wider H72 allocation is the most closely associated with the existing settlement, and it is considered best placed to come forward as the first phase of the wider site. We therefore take the opportunity to support the recognition of this in the Green Belt Review which suggests the land should be developed from south to north.

Part e) of the Policy requires the identification of mechanisms to enhance the quality of, and access to, Green Belt land in the area between the development site and Rawtenstall/ Haslingden.

6.47 It is anticipated that it will be agreed through the masterplanning process and drafting of the design code what measures can be secured under this part of the policy.

6.48 There will be opportunities within the site to enhance connections between the existing village and proposed development into the surrounding Green Belt land and surrounding countryside. The existing public rights of way which cross the site will be retained through the development and any opportunities to encourage connections to the footpath network in the wider area and therefore enhanced access to the wider Green Belt will be explored. This is in accordance with paragraph 138 of the NPPF which requires Local Plans to consider the ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Compliance with Other Emerging Local Plan Policies

6.49 As well as fully according with the elements of emerging Policy HS3, we confirm below that the development will accord with all other relevant policies of the new Local

Plan (as currently drafted). Regulation 19 Local Plan Policy Assessment of compliance of proposed development on land off Exchange Street

Policy HS6: Affordable Housing

The Methodist Church are confident that the development of their land will be able to support the provision of affordable housing, in line with the requirements of this policy. The proposed allocation will therefore make an important contribution towards the affordable housing requirements of the Borough and help to provide a range of house types in Edenfield.

Policy HS7: Housing Density

The Illustrative Masterplan demonstrates how the site can accommodate the proposed amount of development in a manner that will not have a detrimental impact on the amenity, character, appearance, distinctiveness or environmental quality of the area in accordance with this draft Policy.

Policy HS8: Housing Standards

Draft Policy HS8 sets out requirements for new housing to provide for the needs of elderly or disabled residents and accord with the nationally described space standards where possible.

It is anticipated the Design Code to be produced for the strategic site under Policy HS3 can establish these requirements such that the detailed design of the scheme will come forward in line with this requirement.

Policy HS10: Open Space Requirements

The Illustrative Masterplan appended to these representations provides for public open space across the site, including space for a NEAP. Whilst the specific location and quantity of this open space area will be identified at the detailed masterplanning stage, it has been demonstrated that the site can accommodate good levels of public open space and green landscaping, as required by draft Policy HS10.

Policy HS11: Playing Pitch Requirements in New Housing Developments

It is anticipated that any requirement for playing pitches/ contribution to playing pitches to support the development of Site H72 will be identified through the comprehensive masterplan approach under Policy HS3.

Policy HS12: Private Outdoor Amenity Space

The technical and masterplanning work undertaken demonstrates that the site can accommodate predominantly family houses, which each will benefit from good levels of private outdoor amenity space in line with this draft Policy.

Strategic Policy ENV1: High Quality Development

Draft Policy ENV1 sets out how all new development will be expected to take account of the character and appearance of the local area. The policy sets out design criteria that new development should seek to achieve. These are reflected in the detailed wording of Policy HS3 and we set out above how the development will meet these requirements and achieve a high quality housing scheme in accordance with the specific Design Code for the site which is to be drawn up for the allocation.

Strategic Policy ENV2: Heritage Assets

As set out above and demonstrated in the accompanying supporting documents, the development of H72 will not cause harm to the setting and significant of any historic towns, conservation areas or other heritage assets. The nearest Conservation Area is Chatterton/Strongstry Conservation Area to the south-west but this is separated from the site by the A56 and dense woodland. The Listed Edenfield Parish Church located to the east of the site. The Illustrative Masterplan shows how the setting of the Church will be preserved through a development off-set and use of landscaping. Use of local architectural features and sympathetic materials will also reflect the heritage and character of the existing settlement.

Policy ENV3: Landscape Character and Quality

The evidence base informing the Local Plan describes the landscape sensitivity of land west of Market Street (site H72) and concludes that subject to mitigation measures, the development of the site would not cause harm to the wider landscaping setting and character.

In accordance with Policy ENV3, the development will be designed to respond to the natural context and setting of the site and protect and wherever possible enhance the

character and quality of the landscape.

Policy ENV4: Biodiversity, Geodiversity and Ecological Networks

An Ecology Survey of the site has been undertaken to support the promotion of the site. The Illustrative design of the site shows how existing features of biodiversity will be retained. Habitat enhancement measures, including enhancements to the retained woodland on the Church's land will be incorporated throughout the development.

Policy ENV6: Environmental Protection

The technical work undertaken by both the Council and the Methodist Church in relation to the site demonstrates that the site can accommodate the proposed development without any unacceptable adverse impact on health, amenity, biodiversity, air or water quality.

Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality

A Flood Risk Assessment and Drainage Strategy has been prepared by Hydrock to demonstrate the development of the site is suitable in flood risk terms and sustainable drainage systems can be incorporated in line with this Policy.

Policy ENV10: Trees and Hedgerows

The vast majority of the existing trees on site will be retained. A Tree Survey and Ecology Survey have been undertaken in respect of land off Exchange Street which describes how opportunities will be taken to enhance the existing woodland and include new planting across the rest of the site thereby making a positive contribution to Green Infrastructure and Biodiversity in accordance with Policy ENV10.

Strategic Policy TR1: Strategic Transport

This policy encourages proposals which reduce the need to travel and sets out opportunities to enhance the Borough's external and internal connectivity. Site H72 represents a sustainable location for new housing, within walking distance of the range of everyday facilities in Edenfield, and benefiting from good public connections.

Policy TR2: Footpaths, Cycleways and Bridleways

The Combined Illustrative Masterplan shows how the existing Public Rights of Way across the site will be preserved and new connections incorporated across the scheme. Opportunities to enhance the public footpath network in the surrounding area will also be explored.

Policy TR4: Parking

The Design Code required under Policy HS3 can ensure the development provides an adequate level of parking in accordance with this policy.

Please see attached statement prepared by Nexus Planning (including Development Statement and Illustrative Masterplan in relation to Site H72: Land West of Market Street, Edenfield)

Do you wish to participate to the Examination In Public? Yes

Reasons As landowners of part of 'Major Site' H72: Land West of Market Street, the Methodist Church consider it is important to have the opportunity to participate in the examination in support of the allocation of the site and Policy HS3.

Reference	119 Mr Paul Formby	-	Number of supporters:
Commenting on	HS3		
Is the Local Plan legally compliant?	No	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	No

1. At page 18 of the Local Plan Written Statement (Regulation 19) it is stated that: 'The SHMA recommends that the need for additional housing in Rossendale is between 265 and 335 dwellings per year. The Council considers that a figure of at least 265 additional dwellings per year would be sufficient to meet Rossendale's housing needs over the plan period. This equates to a total number of dwellings to be provided over the plan period of 3975. Since the SHMA was produced the Government has announced its intention to implement a standard methodology for calculating housing figures. Using this approach the relevant annual housing provision for Rossendale is set at 212 homes per year. This figure is applicable for 10 years but the Council has extrapolated this over the Plan period, giving a housing figure of 3,180 dwellings.' As such the target number of homes has reduced by 795 or 20% of the original housing target. However, none of this reduction has been applied to the proposed development in Edenfield which means that Edenfield would bear a significant and disproportionate burden of the proposed new homes to be built in Edenfield. In the Greenbelt Topic Paper reference is made to Gallagher Homes v Solihull Borough Council (2014) in which it was held that in relation to the release of greenbelt the Local Authority needed to establish exceptional circumstances but that the boundaries cannot be revised further than is necessary to meet those exceptional circumstances. Given that the overall housing target in Rossendale has been reduced by 795 it is therefore unsound to continue to propose to build 400 new homes on greenbelt in Edenfield.

2. At page 19 of the Local Plan Written Statement (Regulation 19) it is stated that: 'Previously developed (brownfield land) has been identified wherever possible but the supply of sites without significant constraints within the urban boundary is limited. Overall 152 brownfield sites were considered comprising a total of 182.4 ha. 39 of these sites are proposed for development on an area of approximately 45ha.' The approval for development of 45ha of brownfield sites from a possible 182.4 ha is not consistent with a desire to identify brownfield sites wherever possible. One of the exceptional circumstances given as justification for the release of greenbelt land in Edenfield is that the housing built there would attract a premium due to the demand for housing in Edenfield. The premium that the developers would enjoy for housing built on released greenbelt land from Edenfield as opposed to the development of brownfield sites does not constitute exceptional circumstances and does not meet the guidance given in Gallagher Homes v Solihull Borough Council (2014) to keep the proposed revisions to greenbelt to the minimum revision required.

3. At page 26 of the Local Plan Written Statement (Regulation 19) it is stated that: 'Edenfield Primary School is operating close to capacity and there is no capacity at Stubbins Primary School. The preferred course of action of the Education Authority would be to expand Edenfield School onto adjacent land provided that any access issues can be overcome. Should this not prove feasible land would need to be allocated within the proposed residential area for this purpose.'

4. I have made enquiries with the leadership and governors of Edenfield Primary School and have been informed that they have not been approached by the Local Authority for their comments regarding any proposed expansion of Edenfield Primary School. I am of the opinion that the site on which Edenfield Primary School is based is too small for the development proposed in the Local Plan Written Statement (regulation 19). If a new Primary School is required on the land which is proposed to be released from the greenbelt this will impact the number of homes which can be built on the greenbelt yet no provision for the same is made within the Local Plan Written Statement (Regulation 19).

5. On 20 July 2015 the Council published a Local Plan in which no proposed changes to the greenbelt in Edenfield were to be made. On 26 February 2016 the Council published the decision to withdraw the original Local Plan in order to review the same and publish a revised, the current, Local Plan. On 25 July 2018 the Council published the current Local Plan further to which it is proposed to release over 15.25ha of land from the greenbelt in Edenfield in order to allow 400 new homes to be built. Enquiries I have made with HM Land Registry have identified that on 28 July 2016 (ie after the withdrawal of the original Local Plan (in which no greenbelt land was to be released) but before the publication of the current Local Plan (in which it proposed that 15.25ha of land will be removed from the greenbelt in order to build 400 homes) land on the west side of Market Street, Edenfield, Ramsbottom, Bury (which forms part of the 15.25 ha) and registered at HM Land Registry under title number LAN180337 was purchased by Taylor Wimpey UK Limited. I am not privy to the commercial considerations made by Taylor Wimpey UK Limited when making the decision to purchase this land. However, I do find the timing of this purchase (prior to the publication of the proposal to release the same land from the greenbelt) surprising. What, if any, contact was there before the publication of the current Local Plan between the Council, the planning department or the Council's employees and Taylor Wimpey UK Limited? If Taylor Wimpey UK Limited were aware of the Council's proposal to release the land in Edenfield from the greenbelt before their purchase of the land then in my view this would make the Council's

decision to release land from the greenbelt in Edenfield unsound.

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference **5018**

Brian Michael

Kathy Fishwick

Rossendale Civic Trust

Number of supporters:

Commenting on

HS3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

A. RCT support HS3 for Edenfield, and note its now An area comprising 15.25 ha (gross site area) has been identified as potential for providing. Whereas in 2017: residential development, area comprising 26 ha (gross site area) has been identified as potential for providing residential development, subject to national policy in the Framework and other relevant policies of this Local Plan e.g. policy on affordable housing. - will require a well designed scheme that responds to the sites context, makes the most of environmental, heritage and leisure assets and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements –

B. RCT advise that to make sense, to justify the ambition of a Masterplan, we should have a representative community involvement to look at the overall area of Edenfield – not just what's in ownership of a potential developer. To look at the potential ways that it could become an example of, how to do well, an expanded village in the Green Belt. Including, a maybe unwelcome to some, development along a Local Distributor or Spine Road from the areas of Horncliffe Mansion on Bury Road past the Cricket Ground, link to Plunge Road, a Dearden Clough Lake, and on to Rochdale Road. Look for example at how another part of the A56 helped to create the valued areas around Lymm Dam in north Cheshire.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5119 Mr**

Richard

Lester

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

B1.8 Objection is made to Policy HS3: Edenfield on the ground that it is unsound for the reasons set out in paragraphs B1.1 to B1.7 above. Furthermore, it seems that incorporating identification of mechanisms [in the Design Code] to enhance the quality of, and access to, Green Belt land in the area between the development site and Rawtenstall/Haslingden will be an impossible task as the development site will be separated by roads from other Green Belt land, which may well be outside the developers' control. Therefore Policy HS3 is unsound for setting an unachievable requirement and not ensuring compliance with paragraph 138 of the NPPF quoted at paragraph B1.7 above.

B6 Policies HS3: Edenfield and EMP7: New Hall Hey inherently unsound

B6.1 Policy HS3 is unsound in its own terms, as the numerous items mentioned in the penultimate paragraph of the Explanation ought to be specified in the actual Policy.

Do you wish to participate to the Examination In Public? **Yes**

Reasons

Reference **5148****Edenfield Community Neighbourhood Forum**

Number of supporters:

1213

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy HS3: Edenfield

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy

62. Strategic Policy HS3 on Pages 23-25 identifies that proposed housing allocation H72 would be subject to:

- a) a comprehensive development of the entire site through a Masterplan;
- b) the implementation of development in accordance with an agreed Design Code;
- c) phasing and infrastructure delivery schedule for the area;
- d) agreed programme of implementation in accordance with the masterplan; and
- e) identifications of mechanisms to enhance the quality and access to Green Belt land in the area.

63. A Masterplan and Design Code would indeed be necessary for the delivery of housing of this scale. However, to address point (b), applicants are required to provide details on (not restricted to) lighting, parking, noise, refuse and design layout (amongst other matters). These are matters which would be addressed through a planning application (particularly as required in validation checklists) and therefore do not need to be noted within the policy. However, it is of note that the proposed allocation H72 is located close to the A56 by-pass, which is a busy dual carriageway. Due to the valley which Edenfield sits within, the land slopes towards the A56. Most of the proposed development would be at a higher elevation than the A56 which results in a significant impact on openness and important views from and into the village.

64. The noise and air pollution, exacerbated by the prevailing westerly wind alone make this an unsuitable development area. The Local Planning Authority should have investigated these matters further before proposing such a large allocation for housing.

65. The requirement to identify mechanisms to enhance quality and access to Green Belt land shows that the policy fails to reflect and understand the principle of Green Belt. Paragraph 133 of the NPPF (2018) states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” The Council appear to muddle Green Belt and green space.

Figure 9 - Extent of Public Rights of Way around Edenfield

66. This policy has been drafted to its length (spreading over three separate pages) to overcompensate for the lack of detail and evidence to justify this housing allocation, particularly with notable absences of the Highways Capacity Study, a local highways access study, Employment Land Review (to be discussed in addition regarding to Policy EMP2) and the late release of the Green Belt Exceptional Circumstances²⁵. Work to assess the suitability of the site for housing should be front loaded in the process and provided by the Local Planning Authority

67. The Local Plan has been supported by the ‘Lives and Landscapes Assessment for Rossendale Borough Council’ (2015), prepared by Penny Bennett. A large portion of land which now accommodates the emerging allocation H72 was assessed as part of this landscape for scope of Assessment (Appendix E). ‘Area A’ (as seen in Appendix E) is the largest of these areas and when assessed against various criteria, it has been considered unsuitable for development on landscape grounds. Therefore, factoring in the impact on the openness and permanence of the Green Belt, the proposed allocation H72 should not be supported due to the impact on landscape grounds.

Figure 10 – taken from Appendix E of Lives and Landscape Assessment for Rossendale Borough

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5150 Mr Alan Ashworth**

Number of supporters:

Commenting on

HS3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

I object to Rossendale Borough Council's Regulation 19 draft Local Plan on the basis that it is Unsound, it is Not Consistent with National Planning Policies and the Strategy adopted is Not Justified.

In particular I object to Strategic Policy SS relating to Edenfield and Strategic Policy SD2 and Policy HS2 (in so far as they relate to site H72) and Policy HS3.

The following evidence is supplied to support my claims:-

1) The Council have failed to demonstrate any "Exceptional Circumstances" that would justify the release of Land from the Green Belt in the Borough and therefore the proposal is contrary to National Planning Policy. Furthermore they appear to have overlooked the fact that Housing Need in itself is not an Exceptional Circumstance. My comments on the specific points they raised under Exceptional Circumstances in their Green Belt Topic Paper are as follows:-

a) To meet Housing Land Requirement through a balanced approach to supply. The Borough's target has been reduced from 3975 to 3180 for the fifteen year period from 2019-2034, a reduction of twenty percent. The new figure of 3180 equates to ten percent of the existing stock of homes in the Borough. In Edenfield there is to be an increase of approximately forty-seven percent to the Housing number, in comparison with the ten percent for the Borough as a whole, and this will double the built-up area of Edenfield and increase its population by fifty percent. The infrastructure is already under great pressure and the highways have been identified as being a major issue. How could this be considered to be a balanced approach to supply?

b) Address past under-delivery. This can surely not be considered to be a reason to release land from the Green Belt when the Council can simply reclassify empty employment sites for residential purposes. For example the Stubbins Vale Mill site could accommodate close to half of the total housing proposed on land in the Green Belt and the Council are aware that the site owners are interested in developing it for residential purposes. Part of this site is available now, the remainder will become available in 2019, before the Plan takes effect, and the majority of the infrastructure is in place to enable easy deliverability. This option and similar ones that are available should be used to meet the need to address the previous under delivery without taking land from the Green Belt for this purpose.

c) Provision of a balanced employment portfolio in suitable locations for the market. Whilst it is accepted that some of the extensions to the employment sites proposed in the Plan are sensible, for example NE1 to NE5 and M1 to M5, the Council need to re-examine their Employment Site List, include the numerous Sites that have been omitted and collate accurate figures on vacancies in terms of Offices, Retail Premises and Industrial Units on existing sites before taking the easy option of using Green Belt Land. The existing Employment Site Allocation list is inaccurate, sites are missed off the list and some of the site measurements are incorrect. (Refer to Appendix 1 section 3a & 3b.)

d) To enable a balanced approach of housing and employment. The Council have already identified more sites than are required to meet the future needs of the Borough for Employment and they have admitted that several sites have not been carried forward from the previous plan due to poor demand, or where sites are considered to be suitable for other development, including Residential. (Refer to page 54 in the Rossendale Draft Local Plan, Pre-Submission Publication Version, Regulation 19 Consultation and sections 1c, 3a & 3b in Appendix 1.)

If the sites that are not being carried forward were to be reviewed in an objective manner they would provide a far more balanced approach that would also eliminate any perceived need to use Green Belt land for housing.

e) Provide a good mix of housing types across the Borough. There is reference in section 1 of the Exceptional Circumstances (Green Belt Topic Paper, Part 7) to the large site at

Edenfield (H72) being able to contribute to a balanced housing supply by ensuring a mix of housing types and sizes, including affordable provision. This surely cannot in any way be considered as an exceptional circumstance when a good mix of housing types can just as easily be achieved on the larger Brownfield Sites available such as Stubbins Vale Mill. Green Belt Land should not be considered for release, while Brownfield sites are available.

f) Viability. The Council are putting forward an argument for Developers to sell properties (mainly four/five bedroom homes) at a premium price in Edenfield. The high values achievable, they say, would help to fund infrastructure. (Refer to page 25 in the Green Belt Topic Paper.) The infrastructure issues can be similarly funded from the construction of higher density housing on Brownfield sites such as those identified in item (e) above. The fact that values for residential development in the south-west of the Borough are higher than in other parts can hardly be described in any way shape or form as an exceptional circumstance.

g) Other Authorities are unable to meet housing /employment need. There is no need to seek assistance from other Authorities. The Council are aware that there are more than sufficient Brownfield and Mixed Sites to cover the needs identified for both Housing and Employment in Rossendale; they just need to reclassify the Brownfield sites that have not been listed. Again why they consider this to be an exceptional circumstance is difficult to comprehend. (Refer to 1c, 3a & 3b in Appendix 1.)

h) Improving the Green Belt. Policy HS3e (improving access to Green Belt land) is referred to stating that it will be “particularly important with respect to the land to the west of Market Street in Edenfield”. The Green Belt Topic Paper further states that “the developers of this site will be required to identify how they will address this issue.” I am at a loss as to how this could possibly be conceived to be an exceptional circumstance - any problems that arise will only be brought about by allowing building on the Green Belt. If the Green Belt is maintained and all new housing development takes place on the Brownfield and Mixed Sites, this is not an issue.

i) Other Issues Raised. A56 Border and Master Plan Scheme. These are two issues that should not have been taken into account. The A56 does divide the Green Belt in Edenfield into easterly and westerly portions, but the possibility of its being an alternative boundary is no justification for removing the easterly portion from the Green Belt. It is not exceptional for a road to run through the Green Belt. The same applies to the Masterplan Scheme, the opportunity to Masterplan the sites does not provide justification for removing it from the Green Belt. Any large undeveloped or cleared site can be master planned.

j) BC's Conclusion. (Section 8 of the Green Belt Topic Paper.) I would robustly challenge the Council's conclusion that after their examination of “a wide range of sites being considered and the potential for Brownfield land and higher densities given detailed examination” that it is still necessary to have to release Green Belt land for housing. There are many alternatives available to the Council and these are listed in Appendix 1 sections 1c, 1d, 1e, 1f, 3a and 3b. It is also apparent that the Council are keeping their options open on some of the Brownfield sites with their comments in the fourth paragraph of page 54 in their Pre-Submission Publication document.

2) The Strategy that Rossendale Borough Council have followed is not justified because it has not taken into account any reasonable alternatives.

I believe there are sufficient developable Brownfield Land/Sites and other Sites within the Borough to satisfy the Housing Need without the need to release Land from the Green Belt. This statement is based on the facts gained from examination of the Regulation 19 Plan and comparison with the Regulation 18 Plan and noted below:-

a) The Brownfield and Mixed Site List issued on 26th June 2018 was compared with the previous list issued in July 2017 and it was noted that twenty-one Sites with the potential for 656 homes had been removed that were previously considered to be developable or deliverable or viable. The reasons for the removal include Landscape Impact, Access Issues, Topography and the possibility that they are more suitable for Employment Use. (Refer to item 1c in Appendix 1.) The Landscape Impact comments are truly amazing when the Council have chosen to ignore similar comments made by their own Consultants Penny Bennett Associates with respect to part of the Green Belt Land they

are proposing to release in Edenfield. The comment was:-“NOT SUITABLE FOR DEVELOPMENT ON LANDSCAPE”. (Refer to Appendix 3.) Additionally, the majority of those twenty-one re-classified sites failed to make it to the Employment Site Allocations List and are now presumably in the group referred to on Page 54 of RBC’s Pre-Submission Publication document. The relevant comment passage is:

“Following recommendations in the ELR, several employment site allocations and sites have not been carried forward from the previous plan primarily due to poor demand or where sites are considered to be better suited for other development, including residential. This is in line with the Framework, which seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.”

b) An analysis of the Housing Site Allocation Lists issued in July 2017 and August 2018 highlights that 595 homes have been removed due to Highway Issues, Access, Flood Risk and Contamination etc when only twelve months previously they were considered to be acceptable. This represents close to seventeen percent of the homes identified on the July 2017 HSA list being removed. Surely this is excessive culling by any stretch of the imagination and needs to be re-examined? (Refer to item 1d in Appendix 1.)

c) A further analysis of the HSA July 2017 and August 2018 lists highlights that on fifteen sites the Council have reduced the density of homes, resulting in an additional loss of 189 homes when they should have been looking to optimise site density rather than use Green Belt. This is contrary to Paragraphs 122 and 123 of the National Planning Policy Framework. Other Site changes have resulted in a loss of a further twenty homes, making 209 in total. (Refer to items 1e and 1f.)

d) The Council’s Employment Site Allocation List at pages 51 to 53 of the draft Local Plan has been examined and found to be outdated and inaccurate with long-established Employment sites being missed off. They calculated a target of 27ha for projected growth for B1, B2 and B8 uses. (We cannot determine the breakdown of this particular figure or how it has been derived because we are still awaiting the publication of their Employment Land Review.) They have however identified 28ha for growth without including the Brownfield Sites that they reclassified from Housing to Employment Use and we estimate these to be close to 20ha. (More than sufficient to cover the Housing Need without having to use Green Belt Land.) (Refer to items 3a and 3b in Appendix 1.)

e) In the Green Belt Topic Paper produced by the Council there are only five Housing sites proposed and they are as follows:-

H 69 Cowm Waste Water Treatment Works 20 homes.

H 70 Irwell Vale Mill, Irwell Vale 45 homes

H 71 Edenfield Land East of Market Street 9 homes.

H 72 Edenfield Land West of Market Street. 400 homes.

H 73 Edenfield - Around Edenwood Mill / Wood Lane. 47 homes.

This gives a total of 521 homes proposed in the Green Belt of which 456 are in Edenfield. (87.5%). The developments proposed for Edenfield will virtually double the built up area for the village and increase the population by more than fifty percent.

f) Empty Homes. Statistics provided by Lancashire County Council highlight that there were 1,188 empty homes in Rossendale in 2017, and serious consideration must be given to including a proportion of these before releasing valuable and irreplaceable land from the Green Belt. This option has been utilised by the Authority for Burnley which is an adjacent Borough. (Refer to Appendix 2.)

g) Small Sites. The Council have identified 2,853 of the 3,180 homes target but they have not included the sites with five or less houses referred to as Small Sites. The shortfall is 327 which equates to 21.8 homes per annum. The Council have achieved this target in the past from the Small Sites and there is little doubt it can be achieved in the future. They have also not included “windfall developments” such as Hawthorn House which occur from time to time. Note the Small Site numbers only represent ten percent of the

total number of homes involved.

Conclusion. It will be apparent from the alternatives listed above that there were many choices available to Rossendale Borough Council to achieve easily the reduced target of 3,180 homes without resorting to the use of Green Belt Land. The difficulty is in trying to understand why they have chosen to ignore the facts and just blindly ploughed ahead with a proposal to destroy Village life in Edenfield, change it forever and utilise vast swathes of its valuable and irreplaceable Green Belt.

Furthermore they have failed to follow National Planning Policies or provide any justifiable Exceptional Circumstances.

I strongly recommend that they be instructed to re-examine the real possibilities outlined in items 2a, 2b, 2c, 2d, 2f and 2g but this time with a positive view based on the NPPF guidelines.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5173**

Taylor Wimpey

Number of supporters:

Commenting on

HS3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy HS3: Edenfield

2.46 Addressed in section 3 below. (HS2 - H72 comments)

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 7

Comments on policy HS04

Loveclough

Reference **79 Mr P Ramsden Linden Park Developments Ltd** Number of supporters:

Commenting on - Policy HS4

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

This policy requires that new housing developments of 10 or more dwellings (0.35 hectares or part thereof) will be required to provide on-site affordable housing as follows: a) requirement of 30% on-site affordable housing from market housing schemes, subject to site and development considerations (such as financial viability); b) on any rural exception sites including those in the Green Belt there will be a requirement of 100% on-site affordable housing; c) affordable housing shall be provided in line with identified needs of tenure, size and type as set out in the latest available information on housing needs; d) within larger housing developments, the affordable housing will be evenly distributed throughout the development. Where a site has been divided and brought forward in phases, the Council will consider the site as a whole for the purposes of calculating the appropriate level of affordable housing provision. The policy goes on to confirm that where robustly justified, off-site provision or financial contributions of a broadly equivalent value instead of on-site provision, will be acceptable where the site or location is unsustainable for affordable housing. The Representor does not oppose this policy, indeed its origins lie in national planning policy guidance and as such the Council is correct to include a policy of this nature, however the Representor is of the view that the policy should be more specific about viability related issues which provision of affordable housing inevitably raise. By this we mean that the policy should make it clearer that while the provision of affordable is a key policy aspiration, the Council recognises that delivery of the full policy target can render many developments unviable, a key issue in Rossendale given the nature of the local topography which raises a considerable number of site related issues which can be costly to address when sites are being promoted for development. The policy should categorically confirm at the outset that this is recognised and is a key consideration. In addition, the Representor is also of the view that in some instances better and more effective affordable provision can be provided if monies are collected, pooled and provision provided off site. Indeed, such an approach lends itself to smaller sites and sites that might be better promoted as mixeduse developments, where, for example, there might be scope for residential above retail units.

Based on the above in question 35, the policy could be redrafted to say as follows: Policy HS4: Affordable Housing New housing developments through the listed allocations forming part of Policy HS2 will be expected to provide an element of affordable housing unless it can be unequivocally demonstrated that the target provision would render the overall development unviable. In this scenario, the Council will either accept that no affordable units need be provided or will seek a lesser provision in line with the viability of the scheme or alternatively will collect contributions towards provision off site. Relevant sites that will be required to provide affordable units are new housing developments of 10 or more dwellings (0.35 hectares or part thereof). They will be required to provide on-site affordable housing as follows: a) (As per current wording of the policy)

Do you wish to participate to the Examination In Public? **Yes** Reasons In order to purvey the above representation in a professional manner, resulting in the best possible outcome for our client.

Reference **5018 Brian Michael Kathy Fishwick Rossendale Civic Trust** Number of supporters:

Commenting on HS4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS4 and welcome the related aims: to keep sections of the Urban Boundary to the east of Burnley Road to maintain open views to the West. RCT note this policy in earlier Local Plans was supported at recent planning appeals.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5170 Mr Melanie Lindsley The Coal Authority** Number of supporters:

Commenting on HS4

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

Support – The Coal Authority supports the inclusion of criteria c) g as part of this policy which requires measures to deal with mineral on the site. We are also pleased to see that the explanation for this policy identifies that appropriate assessments regarding coal legacy and mineral sterilisation will be required to support the development of this site.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 3

Comments on policy **HS05 Swinshaw Hall**

Reference **79 Mr P Ramsden Linden Park Developments Ltd** Number of supporters:

Commenting on - Policy HS5

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

This deals with the proposed density of new housing development and requires it to be in keeping with local areas and to ensure that it does not have a detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of an area. Although the Representor does not object to the policy as such, in deed it recognises what the policy is trying to achieve, it does raise the issue as to whether the policy is too prescriptive given it applies throughout the Borough as opposed to just areas where landscape quality might be high and/or there are heritage related designations. In addition, there might be possible issues regarding whether the policy clashes with Policy HS2 which allocates sites for development as this includes a target number of units (based on density calculations) and Policy HS4 on provision of affordable housing. This is influenced by viability considerations, which in turn are heavily influenced by the layout, design and density of proposed schemes.

Accordingly, the Representor is of the view that it would be more appropriate for the policy to be pitched more generally and to deal mainly with design, for example: Policy HS5: Design of Housing Developments The Council will require the design of new development, which also covers layout and related matters including density considerations, to be of a high quality and appropriate to the site and its location so as to ensure that the proposed development is appropriate to its surroundings and does not have a detrimental impact on existing amenity.

Do you wish to participate to the Examination In Public? **Yes** Reasons In order to purvey the above representation in a professional manner, resulting in the best possible outcome for our client.

Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
Commenting on		HS5			
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer

RCT support HS5.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5170 Mr	Melanie	Lindsley	The Coal Authority	Number of supporters:
Commenting on		HS5			
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate?	Yes

Support – The Coal Authority supports the inclusion of criteria c) g as part of this policy which requires measures to deal with mineral on the site. We are also pleased to see that the explanation for this policy identifies that appropriate assessments regarding coal legacy and mineral sterilisation will be required to support the development of this site.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 3

Comments on policy **HS06** **Affordable Housing**

Reference	79 Mr	P	Ramsden	Linden Park Developments Ltd	Number of supporters:
Commenting on	-	Policy HS6			
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Yes

For the same reasons as given in relation to Policy HS4 covered in an earlier representation, the Representor does not oppose the principles this policy introduces, rather it suggests that such matters need to be considered in the round, including in the context of impacts on viability, and that such matters will be taken into account should a development not be able to deliver the full requirements of the policy, as per the current draft of it.

That such matters within the policy need to be considered in the round, including in the context of impacts on viability, and that such matters will be taken into account should a development not be able to deliver the full requirements of the policy, as per the current draft of it.

Do you wish to participate to the Examination In Public? **Yes** Reasons In order to purvey the above representation in a professional manner, resulting in the best possible outcome for our client.

Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
Commenting on		HS6			
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>A. RCT supports HS6 subject to inclusion of a policy to identify sites for affordable and social housing to be purchased by the Council for use by RSLs for shared ownership and general let housing in order to meet: The Council's SHMA has demonstrated that there is considerable need for affordable housing in Rossendale and it states that the issue must be tackled to prevent the problem from becoming more acute. The study recommends that there is a need for at least 158 affordable dwellings to be provided in Rossendale per year in addition to market housing and potentially that there is a need for up 321 affordable dwellings per year.</p> <p>B. RCT notes loss on sites, such as Whinberry View from claims of unforeseen site problems.</p> <p>C. RCT note that in 1977 Rossendale had c7230 LA dwellings, 29.3% of c24680 total housing stock. In 2009 RSLs had 3503 self contained units and 1022 supported bedspaces to total 4525, or 14.8% of 30544 total housing stock. In 2016 Rossendale had 80 LA owned buildings, RSL's 4680 (14.8%), private sector 26950, Total 31710. From 2011 to 2016, gain 860 houses, of which 184 or 20% are social, but NOTE Together Housing Group had 66 sales from Right to Buy and Right to Acquire, and it was 150 from 2006-2011.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference **5157 Ms Joanne Harding Home Builders Federation** Number of supporters:

Commenting on HS6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy HS6: Affordable Housing

Policy HS6 is not considered to be sound as it is not effective, justified or consistent with national policy for the following reasons:

This policy requires new housing developments of 10 or more dwellings to provide 30% affordable housing. In general, the HBF supports the need to address the affordable housing requirements of the borough. The SHMA 2016 identifies an annual affordable housing need of 321 dwellings. Whilst the need for affordable housing is not disputed the policy must also be based upon realistic thresholds and targets which are founded on evidence and viability.

The HBF have concerns that the threshold applied to this policy is not appropriate. PPG states that ‘contributions should not be sought from developments of 10-units or less’ (ID:23b-031). Therefore, this policy should be amended to comply with this policy.

The NPPF (2018) is clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened. The HBF have significant concerns in relation to the viability of this policy it is clear within the Council’s own evidence that a significant proportion of the sites are not viable. Paragraph 3.12 of the Economic Viability Study states in relation to Zone 1 state that ‘given that the majority of sites are unviable and those that are viable are only marginally so . . . development in this area are unlikely to be able to support any requirements for affordable homes’. This continues into Zone 2 where again there are viability issues for the majority of sites tested and even where sites are considered viable it is marginal with only small surpluses. It is also considered likely that these viability issues will be exacerbated by other policy requirements across the Local Plan. It is clear that the proposed policy is not supported by the evidence and that further consideration should be given to the affordable housing requirements.

It is clear that NPPF (2018) (para. 57) expects that planning applications that are in line with up to date policies will be viable, whereas what is evident that this will not be the case with the policy as currently proposed. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high, and as the applicant will need to demonstrate the need for a viability assessment it likely this may jeopardise future housing delivery.

The Council may also want to take into consideration the potential amendments to the definition of affordable homes and their provision, as set out in the NPPF.

Policy HS6 states that ‘the affordable housing shall be provided in line with identified needs of tenure, size and type as set out in the latest available information on housing needs. In particular the SHMA indicates there is a requirement for:

- Older peoples housing, especially extra care and residential care, of around 1700 units by 2034;
- Housing suitable for Disabled people.’

The HBF have concerns in relation to how this policy will be implemented and whether the viability of this part of the policy has been considered. Whilst providing affordable housing in line with identified needs sounds like a good idea, the Council may need to contemplate other considerations for example whether it would rather have more homes at an alternative mix, the characteristics of the site or the local area, the type of dwellings being proposed on the site and the general viability of the site. In relation to the bullet

points the policy does not provide any clarity or certainty for a developer, as it not clear whether older people's housing or housing suitable for disabled people will be expected from every development or what proportion will be expected. It is also not clear whether these requirements will be linked to M4(2) or M4(3) requirements, which could make a significant difference to the viability of a development. Concerns in relation to the use of the M4(2) and M4(3) standards have been set out in more detail in relation to policy HS8. The HBF considers that the bullet points should be deleted.

The HBF proposes that the policy is modified as follows:

- That the Council give further consideration to the affordable housing requirement in light of the evidence contained within their own Viability Study, and the
- The HBF consider that if the policy is to be retained that the policy should be amended to reflect national guidance in relation to the thresholds. 'New housing developments of 10 11 or more dwellings (0.35 hectares or part thereof) will be required to provide on-site affordable housing'.
- The HBF consider that if the policy is to be retained that the policy should be amended 'Consideration should be given to the The affordable housing shall be provided in line with identified needs of tenure, size and type as set out in the latest available information on housing needs. In particular the SHMA indicates there is a requirement for:
 - Older peoples housing, especially extra care and residential care, of around 1700 units by 2034
 - Housing suitable for Disabled people'

Do you wish to participate to the Examination In Public? Yes

Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS6: Affordable Housing

9.1 Policy HS6 proposes to apply an affordable requirement of 30% on-site affordable housing on all market housing schemes subject to site and development considerations (such as financial viability).

9.2 This approach does not comply with NPPF requirements or Planning Practice Guidance 2018 ('PPG').

9.3 The Council's Updated Economic Viability Study (2017) (UVES) shows that the proposed Policy HS6 will not be appropriate to apply to sites in value Zone 1, including Bacup, Stacksteads and Weir, as no affordable housing is viable in these locations. Also, 30% affordable housing provision is not viable in three of the schemes tested within value Zone 2, comprising "Whitworth and less affluent portions of Rawtenstall". 30% affordable housing on brownfield sites is also shown to be unviable in all value zones.

9.4 As outlined in section 3 of this paper, the portfolio of allocated sites will deliver a very limited level of affordable housing, notwithstanding the aspirations of Policy HS6, due to their spatial distribution and over reliance on land within weak housing market areas.

9.5 Affordable housing viability will be reduced further, following appropriate adjustments to modelling in line with representations provided by Peel in respect of the UVES.

9.6 NPPF Paragraph 57 states that "Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable."

9.7 PPG reinforces the NPPF (2018). PPG is clear that the role for viability assessment is primarily at the plan making stage. Policies introduced to the plan should be realistic and deliverable. PPG paragraph 2 states:

"The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers. Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage."

9.8 Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage¹⁷.

9.9 The role for viability assessment at the plan making stage is hence to ensure that policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

9.10 Of parallel importance, PPG states in no uncertain terms that the process of developing plan policies that introduce costs to development, and may impact on viability, must be prepared collaboratively via industry engagement.

9.11 It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers¹⁸.

9.12 Turley has received no further engagement since comments were submitted on behalf of Peel in respect of the UEVS following its publication in June 2017.

9.13 The Council has referred to the findings of the UEVS without requiring amendments in line with comments received from representors and without appropriate reference to the results produced within the UEVS, which should have directed the Council to the conclusion that a requirement for 30% affordable housing on all new housing developments of 10 or more dwellings is not viable and will impact on the viability and deliverability of schemes in many areas of Rossendale Borough.

9.14 The proposed affordable housing policy is regarded as unsound as it will undermine deliverability of the plan.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

HS6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS6: Affordable Housing

2.58 Taylor Wimpey fully support the need to deliver affordable housing and agree that policies of this nature should be set within a Local Plan or other statutory planning policy. Taylor Wimpey also recognise their obligations as a responsible housebuilder to assist in meeting such needs.

2.59 The December 2016 SHMA confirms that there is acute affordable need in Rossendale, ranging from 158-321 dpa, which equates to between 60% and 121% of the Council's chosen housing requirement. Meeting this need in full is unlikely to be realistic as this must balance against the impacts that the policy requirement has upon the viability of development. As such, we welcome the Council's flexible approach in HS4 part a, in applying a 30% requirement for market housing schemes "subject to site and development considerations (such as financial viability)".

2.60 We take note that the policy states that new housing developments of 10 or more dwellings will trigger the need for affordable housing provision. This is not consistent with NPPG, which states that: "contributions should not be sought from developments of 10-units or less" (ID:23b-031).

2.61 As such, we politely request that this policy be amended to comply with the NPPG and should start at 11 dwellings or more.

2.62 We also welcome the requirement in part c that the tenure, size and type of affordable provision be based on the 'latest available information on housing needs' rather than any prescriptive requirement. This allows the plan to be more flexible and individual schemes to respond to more localised needs at the time they are being considered. Part c of the policy specifically refers to the SHMA indicating that there is a requirement for: "Older people housing, especially extra care and residential care, of around 1,700 units by 2034."

2.63 Taylor Wimpey fully support the provision of housing for older people, and accept that there is a clear need for such housing in Rossendale, as confirmed in the 2016 SHMA. We would like to reiterate our support for the flexibility of the policy wording of HS6 in this regard, which acknowledges the need for elderly housing without imposing a rigid requirement in terms of a % delivery of housing for elderly homes on all sites. Indeed, we would reiterate that such a rigid approach would not allow for sufficient flexibility for sites to adequately respond to localised needs, and therefore commend the Council on their continued flexible approach on this matter.

2.64 In respect of part d, we note that some schemes may lend themselves, or specific Registered Providers may prefer, to locate the affordable housing in a specific part of the site for practical purposes (i.e. maintenance) or for other site-specific reasons (proximity to public transport routes etc.), and therefore we would ask that some flexibility is built in, such as adding the wording "should be evenly distributed throughout the development, where practical".

2.65 Finally, we welcome the acceptance that both on and off-site provision of equivalent value will be considered.

LAND WEST OF MARKET STREET, EDENFIELD

Policy HS6: Affordable Housing

2.47 Taylor Wimpey fully support the need to deliver affordable housing and agree that policies of this nature should be set within a Local Plan or other statutory planning policy. Taylor Wimpey also recognise their obligations as a responsible housebuilder to assist in meeting such needs.

2.48 The December 2016 SHMA confirms that there is acute affordable need in Rossendale, ranging from 158-321 dpa, which equates to between 60% and 121% of the Council's chosen housing requirement. Meeting this need in full is unlikely to be realistic as this must balance against the impacts that the policy requirement has upon the viability of development. As such, we welcome the Council's flexible approach in HS4 part a, in applying a 30% requirement for market housing schemes "subject to site and development considerations (such as financial viability)".

2.49 We take note that the policy states that new housing developments of 10 or more dwellings will trigger the need for affordable housing provision. This is not consistent with NPPG, which states that: "contributions should not be sought from developments of 10-units or less" (ID:23b-031).

2.50 As such, we politely request that this policy be amended to comply with the NPPG and should start at 11 dwellings or more.

2.51 We also welcome the requirement in part c that the tenure, size and type of affordable provision be based on the 'latest available information on housing needs' rather than any prescriptive requirement. This allows the plan to be more flexible and individual schemes to respond to more localised needs at the time they are being considered. Part c of the policy specifically refers to the SHMA indicating that there is a requirement for: "Older people housing, especially extra care and residential care, of around 1,700 units by 2034."

2.52 Taylor Wimpey fully support the provision of housing for older people, and accept that there is a clear need for such housing in Rossendale, as confirmed in the 2016 SHMA. We would like to reiterate our support for the flexibility of the policy wording of HS6 in this regard, which acknowledges the need for elderly housing without imposing a rigid requirement in terms of a %delivery of housing for elderly homes on all sites. Indeed, we would reiterate that such a rigid approach would not allow for sufficient flexibility for sites to adequately respond to localised needs, and therefore commend the Council on their continued flexible approach on this matter.

2.53 In respect of part d, we note that some schemes may lend themselves, or specific Registered Providers may prefer, to locate the affordable housing in a specific part of the site for practical purposes (i.e. maintenance) or for other site-specific reasons (proximity to public transport routes etc.), and therefore we would ask that some flexibility is built in, such as adding the wording "should be evenly distributed throughout the development, where practical".

2.54 Finally, we welcome the acceptance that both on and off-site provision of equivalent value will be considered.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Number of comments in this section	5
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Comments on policy HS07	Housing Density
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Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

HS7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Explanation

The Government's Housing White Paper 'Fixing our broken housing market' (2017) encourages better use of land for housing by encouraging higher densities where appropriate, such as in urban locations where there is high housing demand. This is repeated in the Framework within the "Making effective use of land" chapter and especially paragraph 123.

Densities in excess of 40 dwellings per hectare will be expected to be delivered in town centres within Rossendale. Other sustainable locations where higher densities will be expected include sites within the urban boundary and within 300 metres walk to bus stops on key corridors such as the X43 and 464 bus routes. High quality design can ensure that high density proposals are good quality schemes.

It is recognised that housing densities will be lower in other areas of the Borough because of physical constraints and on site issues, for example, topography, areas at risk of flooding and landscape.

A. RCT notes previous objections and welcomes HS7 and how it's Explanation has changed from 2017: Densities in excess of 30 dwellings per hectare will be expected to be delivered in sustainable locations within Rossendale. Sustainable locations include urban areas and areas around public transport nodes. The figure of 30 dwellings per hectare is reflective of historic housing densities in some parts of Rossendale.

B. RCT note present 2011 Core Strategy was adopted after: "Report to Rossendale Borough Council by Roland Punshon BSc Hons, MRTPI an Inspector appointed by the Secretary of State for Communities and Local Government 10 October 2011"

Appendix D: Monitoring and Implementation Strategy:-

70% of all new residential development in Rawtenstall, Bacup, Haslingden and Whitworth to be built at 50 dwellings per hectare. 85% of all new residential development in all other areas to be built at 30 dwellings per hectare.

C. RCT have noted in a July 2014 RBC Annual Monitoring Report:-

Progress towards Targets

In 2013/2014 only 3.5% of dwellings built in Rawtenstall, Bacup, Haslingden and Whitworth were built at 50 dwellings per hectare. Although the cumulative three year figure is slightly higher at 9.8%, this figure also falls well below the target and trigger.

The results are significantly underperforming against the target despite the Council working with partners and developers to encourage higher density housing developments. It may be necessary to review this policy or investigate why high densities are not being achieved, and consider how this can be resolved.

For areas outside Rawtenstall, Bacup, Haslingden and Whitworth, the density of new residential development being built at 30 dwellings per ha or above was 92.5% in 2013/2014 which is above the target. Over the cumulative three years the figure stands at 67% which is marginally below the trigger

The results are significantly underperforming against the target despite the Council working with partners and developers to encourage higher density housing developments

D. RCT suggest this example, to maybe illustrate how choices made by RBC lead to their not achieving their Core Strategy Policy 2 targets. Look at the 2015 Local Plan's withdrawn consultation: Tier 1 site H16 Whinberry View, detailed in Site Allocations as 29 houses on 0.6Ha at 48/Ha. But on this area it was actually 23 houses at 38/Ha. The developer purchased 166 Bacup Road to get 29 houses on 0.72Ha and so 40/Ha. Now the northern part of this site is in an area of sloping Greenlands, and there's now

permission, for 28 – 39/Ha, to cut into this with sheet piling and retaining walls close to a densely tree planted boundary with Rossendale BC's H13 Greenlands. RCT's representations suggested the exclusion of the site's Greenland and a simple 3 row layout of 31 terraced houses on 0.6Ha at 52/HA.

E. RCT in 2017 did not see the proposal, to come down from 50 to 30/Ha, meeting the aims of this White Paper where it talks about:-

A.67 Local planning authorities decide what sort of density is appropriate for their areas. A locally led approach is important to ensure that development reflects the character and opportunities presented by each area. At the same time, authorities and applicants need to be ambitious about what sites can offer, especially in areas where demand is high and land is scarce, and where there are opportunities to make effective use of brownfield land given the strong economic and environmental benefits.

A.68 To help ensure that effective use is made of land, and building on its previous consultations,¹⁰⁵ the Government proposes to amend the National Planning Policy Framework to make it clear that plans and individual development proposals should:

make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs

ensure that the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs (which may, for example, mean terraced houses).

F. RCT in 2017 therefore suggested this alternative to HS5, and see it as still relevant:-

Residential development should seek to achieve the maximum density compatible with good design, the protection of heritage assets, local amenity, the character and quality of the local environment, and the safety and convenience of the local and strategic road network.

70% of all new residential development in Rawtenstall, Bacup, Haslingden and Whitworth to be built at 50 dwellings per hectare. 85% of all new residential development in all other areas to be built at 30 dwellings per hectare.

Housing type densities:-

1. Low cost Market Housing: 3 bed / 4 person and 3 bed / 5 person mostly in linked pairs and short terraces at about 40 - 60 / Ha.
2. So called "Aspirational" Market Housing: 4 bed / 6 person and 5 bed / 7 person detached at about 20 – 40 / Ha.
3. Apartment Housing both Social and Market: at 100 – 200 / Ha.
4. Social "General Let" Housing: 3 bed / 4 person, 3 bed / 5 person and 4 bed / 6-8 person in terraces at about 70 – 90 / Ha.
5. Category 1 Social Housing for old persons: 1 bed 2 person and 2 bed / 3 person single storey in terraces at about 50 – 70 / Ha.

Standard definition of Housing Density, as DOE Circular 88/71 26 November 1971. Housing Density (bed spaces) per hectare.

RCT nevertheless welcome this proposal to test at the Inquiry of the Local Plan:

Density (net)

Net site density includes only those areas which will be developed e.g. for housing and directly associated uses such as access roads within the site, private garden spaces, car parking areas, incidental open spaces and landscaping and children's play areas where these are to be provided. It excludes major distributor roads; primary schools; adult / youth play spaces or other open spaces serving a wider area; and significant landscape buffer strips.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5157 Ms Joanne Harding Home Builders Federation** Number of supporters:

Commenting on HS7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy HS7: Housing Density

Policy HS7 is not considered to be sound as it is not effective, justified or consistent with national policy for the following reasons:

This policy looks for high densities within sustainable locations, the justification text suggestions that densities in excess of 40dph will be expected in the town centres.

Whilst the NPPF, paragraph 47, does indicate local authorities can set out their own approach to housing density this should be based upon local circumstances and not harm the overall objective of boosting significantly housing supply. The HBF recommends the Council ensure that the appropriate evidence is available to support this policy. The high-density development proposed in this policy may be difficult to market as it could be likely to result in small garden areas, no garages and little parking. It is considered that lower density developments would be more marketable, and the policy should be amended to allow for flexibility, this flexibility could include allowing developers to take account of local site characteristics, market aspirations and viability.

The HBF proposes that the policy is modified as follows:

- Developers can determine the density of the development should be providing that the scheme is in keeping with local areas; and have has no detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of an area; and consideration is given to the local site characteristics, market aspirations and the viability of the site.

High densities developments will be supported shall be provided within sustainable locations particularly on sites within defined town centres and locations within 300m of bus stops on key transport corridors.'

Do you wish to participate to the Examination In Public? **Yes** Reasons

Reference **5160 The Peel Group** Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS7: Density

9.15 Policy HS7 should be amended as follows:

The density of the development should be in keeping with local areas and have no should not give rise to significant detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of an area.

High densities shall be provided, where possible, within sustainable locations particularly on sites within defined town centres and locations within 300m of bus stops of key transport corridors.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

HS7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS7: Housing Density

2.66 We agree with Policy HS5 as drafted, as it allows for sufficient flexibility and variation in density, based on the characteristics of the individual site; rather than a blanket prescriptive requirement.

LAND WEST OF MARKET STREET, EDENFIELD

Policy HS7: Housing Density

2.55 We agree with Policy HS5 as drafted, as it allows for sufficient flexibility and variation in density, based on the characteristics of the individual site; rather than a blanket prescriptive requirement.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section

4

Comments on policy HS08**Housing Standard**Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

HS8

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS8 and note that: The SHMA also shows that there is a high percentage of households containing one or more adults with some form of disability (15.8%) and found that households containing a disabled resident were more likely to consider that their home is unsuitable than the Borough-wide average.

Note Part M Building Regulations, which from mid 80s aimed to help “care in the community” to ensure that most people are able to access and use buildings and their facilities. It applies to all housing – so what’s the extra guidance for at least 30%??? Is it to avoid repeats of all purpose Kitchen Dining Lounges to allow wheelchair space in Bathrooms and Bedrooms??? To avoid “cheapskate” aims to achieve wheelchair housing at “Parker Morris” areas???

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5157 Ms	Joanne	Harding	Home Builders Federation	Number of supporters:
Commenting on		HS8			
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer

Policy HS8: Housing Standards

Policy HS8 is not considered to be sound as it is not effective, justified or consistent with national policy for the following reasons:

This policy looks for at least 20% of new housing to be specifically tailored to meet the needs of elderly or disabled residents, or be easily adaptable in line with the Optional Standards. It does not state whether it expects these homes to be in line with M4(2) or M4(3). The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Rossendale which justifies the inclusion of optional higher standards for accessible / adaptable homes in its Local Plan policy. The HBF do not consider that the evidence provided is sufficient to support the policy for M4(2) or M4(3) standards. However, if the Council can provide the appropriate evidence and this policy is to be retained then the HBF recommend that an appropriate transition period is included within the policy.

This policy looks for development to meet national spaces standards as a minimum. However, these enhanced standards, as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.

PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. It is also noted that there is no reference within the policy or the evidence in relation to timing or a transitional period.

The HBF consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.

The HBF proposes that the policy is modified as follows:

- The HBF proposes that the policy is deleted.
- If the Council, have the appropriate evidence to support the policy and as such it is considered appropriate to retain the policy, the HBF recommends that the policy is amended to include a transitional period before the introduction of both a) and b), and that an appropriate caveats are added in relation to the suitability of the site and the viability of development.

Do you wish to participate to the Examination In Public? **Yes**

Reasons

Reference **5160**

The Peel Group

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS8: Housing Standards

9.16 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

HS8

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS8: Housing Standards

2.67 Policy HS6 indicates that the Council intend to introduce accessibility standards (at least 30% of housing to be wheelchair adaptable) and national internal space standards and we comment on these in turn.

a) Access- meeting the needs of elderly or disabled residents

2.68 Whilst Taylor Wimpey are committed as a responsible house builder to deliver accessible forms of housing if required, this must be based on a demonstrable need, and therefore we would request that evidence and clarification is provided on this matter.

2.69 Part A requires at least 20% of any new housing development to meet the needs of elderly or disabled residents, or be easily adaptable; subject to site-specific factors and viability. Notably, this is a decrease from the 30% threshold previously set in the Regulation 18 consultation, albeit there is still an absence of evidence which justifies the need for an introduction of any specific % requirement in the Borough.

2.70 Whilst we welcome the flexibility provided within this policy and would highlight that site specific factors such as topography are a major issue in Rossendale, we do raise concerns with the 20% starting point.

2.71 The explanatory text to this policy indicates that the SHMA highlights a considerable growth in the number of elderly households, as well as a high percentage of households containing one or more adults with some form of disability.

2.72 This reflects the aging population trend which can be seen nation-wide. Paragraph 10.74 of the SHMA also confirms that 18.5% of households in Rossendale contain one or more adults with some form of disability. However, whilst the SHMA provides a starting point in establishing demographic trends, it does not provide enough evidence to translate this into a policy threshold for housing to be adapted to these specific groups and certainly not one set at 20%.

2.73 Firstly, neither the SHMA nor wider evidence base confirms the proportion of these groups who will require dedicated, and wheelchair adaptable new housing, as many may wish to stay put and adapt their own homes. Furthermore, whilst the Viability Assessment states that it has factored these requirements in, these are insufficiently evidenced and justified in the report, which gives no detailed breakdown of the costs involved.

2.74 It is worth reiterating Section 56 of the NPPG, which confirms that the introduction of new enhanced standards on water efficiency, accessibility and spaces are optional, and must be justified by specific evidence on need and viability before they can be implemented. The evidence in this instance falls well short of demonstrating the need or viability of a 20% target.

b) Internal Space- National space standards

2.75 As with the elderly housing requirement, we have concerns with the application of the National Space Standards on the basis that the need and viability for this has not been sufficiently demonstrated within the evidence to meet the requirements of the NPPG (paragraph 56-020-20150327). The SHMA does not consider housing size in this context, and whilst the Viability Assessment states that it has factored these standards in, the implications are not properly articulated.

2.76 In respect of the space standards, the NPPG also requires that transitional arrangements are considered following adoption to enable developers to factor the associated costs into future land acquisitions, and there has been no discussion of this in the Draft Plan or evidence.

2.77 As such we would request that this requirement is removed or that additional evidence and clarification is provided.

2.78 Taylor Wimpey welcome the inclusion of the policy wording which states that as an alternative to the implementation of Optional Space Standards, developers will be expected to demonstrate that the requirements of 'Building for Life 12' have been met within a scheme. This allows for further flexibility for developers, and an alternative way forward in the event that space standards could undermine the viability of a scheme.

LAND WEST OF MARKET STREET, EDENFIELD

Policy HS8: Housing Standards

2.56 Policy HS6 indicates that the Council intend to introduce accessibility standards (at least 20% of housing to be wheelchair adaptable) and national internal space standards and we comment on these in turn.

a) Access- meeting the needs of elderly or disabled residents

2.57 Whilst Taylor Wimpey are committed as a responsible house builder to deliver accessible forms of housing if required, this must be based on a demonstrable need, and therefore we would request that evidence and clarification is provided on this matter.

2.58 Part A requires at least 20% of any new housing development to meet the needs of elderly or disabled residents, or be easily adaptable; subject to site-specific factors and viability. Notably, this is a decrease from the 30% threshold previously set in the Regulation 18 consultation, albeit there is still an absence of evidence which justifies the need for an introduction of any specific % requirement in the Borough.

2.59 Whilst we welcome the flexibility provided within this policy and would highlight that site specific factors such as topography are a major issue in Rossendale, we do raise concerns with the 20% starting point.

2.60 The explanatory text to this policy indicates that the SHMA highlights a considerable growth in the number of elderly households, as well as a high percentage of households containing one or more adults with some form of disability.

2.61 This reflects the aging population trend which can be seen nation-wide. Paragraph 10.74 of the SHMA also confirms that 18.5% of households in Rossendale contain one or more adults with some form of disability. However, whilst the SHMA provides a starting point in establishing demographic trends, it does not provide enough evidence to translate this into a policy threshold for housing to be adapted to these specific groups and certainly not one set at 20%.

2.62 Firstly, neither the SHMA nor wider evidence base confirms the proportion of these groups who will require dedicated, and wheelchair adaptable new housing, as many may wish to stay put and adapt their own homes. Furthermore, whilst the Viability Assessment states that it has factored these requirements in, these are insufficiently evidenced and justified in the report, which gives no detailed breakdown of the costs involved.

2.63 It is worth reiterating Section 56 of the NPPG, which confirms that the introduction of new enhanced standards on water efficiency, accessibility and spaces are optional, and must be justified by specific evidence on need and viability before they can be implemented. The evidence in this instance falls well short of demonstrating the need or viability of a 20% target.

b) Internal Space- National space standards

2.64 As with the elderly housing requirement, we have concerns with the application of the National Space Standards on the basis that the need and viability for this has not been sufficiently demonstrated within the evidence to meet the requirements of the NPPG (paragraph 56-020-20150327). The SHMA does not consider housing size in this context, and whilst the Viability Assessment states that it has factored these standards in, the implications are not properly articulated.

2.65 In respect of the space standards, the NPPG also requires that transitional arrangements are considered following adoption to enable developers to factor the associated costs into future land acquisitions, and there has been no discussion of this in the Draft Plan or evidence.

2.66 As such we would request that this requirement is removed or that additional evidence and clarification is provided.

2.67 Taylor Wimpey welcome the inclusion of the policy wording which states that as an alternative to the implementation of Optional Space Standards, developers will be expected to demonstrate that the requirements of 'Building for Life 12' have been met within a scheme. This allows for further flexibility for developers, and an alternative way forward in the event that space standards could undermine the viability of a scheme.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Number of comments in this section 4

Comments on policy HS09 Private Residential Garden DevelopmentReference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on HS9

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS9.

Do you wish to participate to the Examination In Public? **Did not answer** ReasonsReference **5160** **The Peel Group** Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS9: Private Residential Garden Development

9.17 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy HS10 Open Space Requirements in New Housing Developments

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on HS10

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS10 subject to inclusion of a reference to Sport England guidance, which no doubt will be in the SPD. RCT also note need to ensure that open spaces, which can include unadopted parking and their access areas, need to have accountable and insured management, and in passing note that this is often why they have been planned out of areas. RCT note the Street Manager provisions for frontagers to such areas in the 1991 New Roads and Streetworks Act.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5160** **The Peel Group** Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS10: Open Space Requirements

9.18 The general approach to Policy H10 is supported. However, this indicates that on all schemes of fewer than 100 dwellings, open space provision will be required to be secured via a financial contribution towards off site provision. This policy approach is inflexible. There may be instances where schemes of fewer than 100 dwellings provide opportunities for onsite open space provision, which should not be precluded by the policy.

9.19 The second paragraph of the policy should be amended as follows:

Where there is an identified local deficiency in quantity and/or accessibility to open space, provision will be required. This should be on-site for housing schemes of 100 or more dwellings. Where it is demonstrated that this is not appropriate, payment of a financial contribution towards off-site provision or improvements to existing open spaces and recreation facilities will be required. Either on site, where appropriate, or a financial contribution towards off site provision will be required in respect of smaller schemes below 100 units.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

HS10

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS10: Open Space Requirements in New Housing Developments

2.79 This Policy confirms that the existing SPD on Open Space will be updated to discuss minimum local standards and appropriate financial contributions. We therefore reserve the right to comment on these local standards and financial contributions as and when the SPD is updated and consulted on.

2.80 The policy later makes reference to how, in Whitworth and Bacup in particular but not exclusively, contributions will be sought for Suitable Alternative Natural Greenspace (SANGs) to minimise recreational pressure on sensitive habitats. We outline some of our concerns relating to SANGs later in these representations, under Policy ENV4.

LAND WEST OF MARKET STREET, EDENFIELD

Policy HS10: Open Space Requirements in New Housing Developments

2.68 This Policy confirms that the existing SPD on Open Space will be updated to discuss minimum local standards and appropriate financial contributions. We therefore reserve the right to comment on these local standards and financial contributions as and when the SPD is updated and consulted on.

2.69 The policy later makes reference to, how in Whitworth and Bacup in particular, but not exclusively, contributions will be sought for Suitable Alternative Natural Greenspace (SANGs) to minimise recreational pressure on sensitive habitats. We outline some of our concerns relating to SANGs later in these representations, under Policy ENV4.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 3

Comments on policy HS11**Playing Pitch Requirements in New Housing Developments**Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

HS11

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS11 subject to inclusion of a reference to Sport England guidance on needs that might require new facilities, and note: Poor condition pitches include those at Haslingden Sports Centre and Maden Recreation Ground, Bacup. The main reason for pitches performing poorly was inadequate drainage. The Study recommends that investment in pitch quality and maintenance should be a priority.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

HS11: Playing Pitch Requirements

9.20 Policy HS11 should be clear that the requirement for a contribution to playing pitch provision is only required where existing provision is insufficient to meet the needs of the development having regard to relevant adopted standards. It should be amended as follows:

Housing developments of 10 or more new dwellings will be required to pay a financial contribution towards improving existing playing pitches in the Borough where it is proven that existing provision cannot meet the needs of the development based on locally adopted standards.

9.21 It is noted that a future SPD will be developed to establish the relevant standard, local level needs and the scale of financial contributions required per dwelling.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

HS11

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS11: Playing Pitch Requirements in New Housing Developments

2.81 Again, it is stated that an accompanying SPD will be produced to establish minimum local standards and appropriate financial contributions from new residential development. We reserve the right to comment on this matter further as and when the SPD is produced and consulted on.

LAND WEST OF MARKET STREET, EDENFIELD

Policy HS11: Playing Pitch Requirements in New Housing Developments

2.70 Again, it is stated that an accompanying SPD will be produced to establish minimum local standards and appropriate financial contributions from new residential development. We reserve the right to comment on this matter further as and when the SPD is produced and consulted on.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section

3

Comments on policy HS12**Private Outdoor Amenity Space**

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

HS12

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS12.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

HS12

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS12: Private Outdoor amenity space

2.82 We welcome the flexibility of this policy, which does not seek to impose prescriptive, blanket standards in terms of outdoor amenity space provision. Instead, the policy states how outdoor amenity space for individual dwellings will have regard to the size and type of dwelling(s) proposed, as well as the character of the development and the garden sizes in the immediate neighbourhood. We commend the Council on this approach, which allows sufficient flexibility for developments to adequately respond to site specific matters and local characteristics.

LAND WEST OF MARKET STREET, EDENFIELD

Policy HS12: Private Outdoor amenity space

2.71 We welcome the flexibility of this policy, which does not seek to impose prescriptive, blanket standards in terms of outdoor amenity space provision. Instead, the policy states how outdoor amenity space for individual dwellings will have regard to the size and type of dwelling(s) proposed, as well as the character of the development and the garden sizes in the immediate neighbourhood. We commend the Council on this approach, which allows sufficient flexibility for developments to adequately respond to site specific matters and local characteristics.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section

2

Comments on policy HS13**House Extensions**

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on HS13

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS13 subject to inclusion of a presumption against roof extensions, such as wall to wall “box dormers” that do not respect their locations.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy **HS14** **Replacement Dwellings**

Reference **2 Mr John Lamb** **Lancashire Wildlife Trust Ltd.** Number of supporters:

Commenting on - HS14

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

There is no reference to identifying the presence of statutorily protected species such as bats and breeding birds, and making allowance for replacement structures such as bat roosts, bird nesting boxes etc. In accordance with the requirements of the NPPF, development should deliver net gains in nature and this should be like for like wherever possible in terms of habitats and/or species adversely affected by the development.

Specific reference to confirming the presence or absence of statutorily protected species such as bats and breeding birds, and, if found to be present, to make allowance for replacement structures such as bat roosts, bird nesting boxes etc. In accordance with the requirements of the NPPF, development should deliver net gains in nature and this should be like for like wherever possible in terms of habitats and/or species adversely affected by the development.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on HS14

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS14.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy HS15	Rural Affordable Housing - Rural Exception Sites
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Reference	2 Mr John Lamb	Lancashire Wildlife Trust Ltd.	Number of supporters:
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Commenting on	-	HS15
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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There is no reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors. In accordance with the requirements of the NPPF, development should deliver net gains in nature.

Reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors. In accordance with the requirements of the NPPF, development should deliver net gains in nature.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
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Commenting on	-	HS15
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	No
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RCT support HS15 subject to plan/s to relate it to The Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 No. 2098, and that Council has no proposals to remove such areas from within the present Urban and Green Belt Boundaries – in particular where social housing has been built.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons	
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Number of comments in this section 2

Comments on policy HS16	Conversion and Re-Use of Rural Buidlings in the Countryside
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Reference **2 Mr John Lamb Lancashire Wildlife Trust Ltd.** Number of supporters:

Commenting on - HS16

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

There is no reference to the need that the development should deliver, in accordance with the requirements of the NPPF, net gains in nature.

Specific reference to the need for the development to deliver net gains in nature, in accordance with the requirements of the NPPF.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5018 Brian Michael Kathy Fishwick Rossendale Civic Trust** Number of supporters:

Commenting on HS16

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS16.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy **HS17 Rural Workers Dwellings**

Reference **5018 Brian Michael Kathy Fishwick Rossendale Civic Trust** Number of supporters:

Commenting on HS17

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS17.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy HS18	Gypsies, Travellers and Travelling Showpeople
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Reference **2 Mr John Lamb Lancashire Wildlife Trust Ltd.** Number of supporters:

Commenting on - HS18

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

There is no reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors. In accordance with the requirements of the NPPF, development should deliver net gains in nature.

Specific reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors. In accordance with the requirements of the NPPF, development should deliver net gains in nature.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **10 Mrs Nicola Longmire** - Number of supporters:

Commenting on -

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Due to the fact that the travellers site on future parks Bacup was not properly thought through . No consultation with local residents before being passed at the meeting. Also the land is contaminated according to the 2013 report and needs a lot of money spent on the land to clean it up to build on it. The site at futures park is supposed to be used for business and the whole area need money spent to regenerate and investment in jobs. Can't waste millions on a travellers site needs to invest in jobs. Also need to work with other areas to see if we really need a travellers site as there is plenty of spaces in other areas .

Need to remove the travellers site at futures park from the plan and work with other areas to see if we actually need one anywhere in rossendale as there is plenty of site unused in neighbouring areas.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **99 Mr Freddy Khattab** - Number of supporters:

Commenting on Gypsy site -

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

The land has been surveyed and is contaminated which makes it unsafe for a transit site. Furthermore more around 2000 residents did object this site being used by the travelling community for obvious reasons.

Chose another area. Decontamination of the land.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	113 Mrs Hilary Fairclough	-	Number of supporters:
Commenting on	-	-	
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	No
<p>Soundness of plan.The proposed siting of a travellers site is on contaminated land which would pose a substantial cost to the tax payer,also this area is a tourist attraction for lee quarry and the people it attracts to use this amenity.The proposed housing plan to the area is too high.Rossendale has the worst transport infrastructure in the country as stated in a traffic study and more housing can only add to this problem,Rossendale has more traffic congestion than anywhere else excluding cities this was stated in the report from the national infrastructure commission,the air quality is also affected and will get worse,nitrogen dioxide levels currently exceed the allowed readings and will increase with more housing and the vehicles these will bring to the area,this will add to congestion which is already a major issue.The proposed planning for housing on the higher part of the valley which is to the north will cause more flooding to the lower land,the fields hold and retain a lot of rainfall and if removed poses flooding lower down.Also The amount of proposed housing will put pressure on doctors surgery's,schools,public transport which is not adequate for the area now.</p> <p>Remove the proposed site for the traveller site.this area would be better used for a trail centre for lee quarry which already attracts biker from all over,this area is an asset to Bacup and should be developed for that use to attract more tourism.The housing proposed plan should be reduced,the service and road infrastructure cannot support this.</p>			
Do you wish to participate to the Examination In Public?	No	Reasons	-

Reference **5011****Diane****Hudson**

Number of supporters:

Commenting on

HS18

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

To whom it may concern,

Please accept this as a formal objection as part of the Regulation 19 consultation. The primary basis for my objection is that the paper in relation to the proposed Gypsy and Traveller Topic Paper is unsound for the reasons set out below.

Whilst it's clear from the table you provide in your topic paper, that Futures Park is the location with the greatest number of encampments, such a broad-brush approach to reviewing this data must be tempered by consideration that:

1. Your records of unauthorised camps at Futures Park include encampments occurring on both public highway and on the land proposed as a site. I note that your records only identify one occurrence of 'Futures Park – Highway' but I would like it to be noted that this has not been the only instance of the encampment occurring on the highway at this location. To my knowledge there has been approximately 10 instances in which an unauthorised encampment has occurred on the highway at this location. On this basis, I suggest Futures park's figures are to be distinguished from other localities since the figures comprise both unauthorised encampments on and off highway. There is no proposal by the council to remove highway rights from Futures Park and therefore the number of encampments occurring on the highway could remain the same, even if the land off Futures Park was allocated as a site. In fact, the imposition of the site may act as an invitation for other travellers to stop outside of the site, on the highway of Futures Park.
2. Whilst the number of encampments is highest at Futures Park, it's also noteworthy that with the exception of the encampment of the 29th April 2011, their duration was noticeably shorter than that at many of the other locations listed.

My property

I own and reside at X. It's clear from your plan of the proposed plots that Plot 5 would be situated adjacent to my land. It's unclear to me how this Plot might be set out and therefore I'm unable to comment on how this might adversely impact upon the enjoyment of my land.

Local ecology

Whilst enjoying my land I regularly see a number of deer in my fields, primarily seeming to come and go from the woodland to the north of my land/through plot 5/to the land situated at the east of Plot 5. Your paper makes no reference to ecological impact, whether any studies have been undertaken and what impact the proposed sites might have upon this. Notwithstanding the deer in this location, there is a plethora of wildlife at northern end of my fields, including those in a tributary of the river Irwell possibly including the great crested newt. The ecological impact of the proposed site must be given proper consideration to ensure the local environment is not adversely affected.

Protection of the local amenity and environment

Paragraph 10 of the 2015 guidance to which you refer asserts that local authorities should "protect local amenity and environment" in producing their Local Plan. On that basis, I draw your attention to the council's own website (link [HERE](#)) in which you describe the "Lee Quarry Trailhead and Futures Park" as 'Set in the heart of Rossendale amongst some of the most stunning scenery in the North West is Lee Quarry, the pre-eminent destination for thrillseeking off-road cyclists. As a nationally recognised mountain bike leisure destination with over 14km of advanced and graded adventure routes". The website goes on to say that "Future's Park is located next to the trailhead centre offering modern build commercial office space as part of the ongoing development an opportunity has arisen for an investor to compliment the proposed scheme, whilst generating a substantial return on investment. We are keen to speak with all business' looking to become part of this vision particularly suite office and leisure focused businesses.". It's clear then that both the quarry and Futures Park are regarded by the council as a local amenity.

From my own experience I also know that the quarry is regularly visited by both leisure cyclists and utilised for the holding of sporting events (not being limited to just cycling). Those visiting Lee Quarry are encouraged to park along Futures Park and walk/cycle up into the quarry. In addition, many of the events held at the quarry have had participants camping over and staying down at Futures Park. If the same were to happen with the site in situ, it would be hard for the council to 'promote peaceful and integrated co-existence between the site and the local community'. As such, if Futures Park were to be allocated as a site for travellers it is reasonable to conclude (from having spoken to

many visitors to the quarry) that they would either not travel to the quarry or that they would attempt to drive up the access road to the quarry. This access road is not a vehicular highway and there is no public right for people to drive along it so displacing visitors in this way would be unacceptable. Further, having received significant funding, time and effort from both yourselves and the County Council, to have futures park as a proposed site seems entirely at odds with the guidance that council's should protect local amenity in producing their LP when it's entirely probable that the imposition of a site in this location will detrimentally impact upon the use of the quarry and Futures Park. The health benefits of cycling and being out in the countryside are well documented and will have formed part of the business case for the creation of the adrenaline gateway at Lee Quarry. With this in mind, it seems to me that it's against the 2015 guidance for the council to feasibly consider land off Futures Park to be a suitable location for the traveller site.

In addition, it can be seen that both Plot 5 and Plot 3 would seek to include land which is currently planted and which includes officially constructed mountain bike trails to incorporate into the Adrenaline Gateway at the quarry. To facilitate these plots would be removing both of these fantastic features, neither of which is justifiable.

I assume your reference to the 'potential negative impact on any end-users' relates to the users of the quarry and Futures Park as described above. If this is the case, it seems over simplistic to refer to these as 'end-users' without giving context that this is something the council have spent more than a decade actively encouraging such that its popularity (and corresponding amount of end users) has increased substantially.

Regulation 19 consultation

It's noted under the above heading that there is a positive listed for Futures Park that there is 'some political support'. Whilst I note the presence of 'some', the paper goes on to confirm that the local MP has supported a petition against the proposed allocation site at Futures Park. On that basis, it seems illogical to suggest that 'some' political support could be considered a positive, given the MP's support for the petition.

Further, the first two negative impacts for this site are noted (being impacts on the proposed master-planning, restrictive covenants and clawback implications) and I suggest that these points need to be explained fully, in an open and transparent manner. It's possible that the financial impact of the restrictive covenant and clawback could run to hundreds of thousands of pounds and therefore their importance cannot be over-stressed when considering the feasibility of a site at this location. In addition, the combination of the impact on the masterplan has the ability to damage the economic development and commercial attractiveness of not only Futures Park, but Bacup as a whole. This is especially relevant to JJO kitchens (possibly the largest employer in the area?). They have used this area of highway as an informal overspill in which to park their wagons for many years. This arrangement has, to my knowledge, never been the cause of any complaints and they seem to be courteous at all times. As such, they've been able to do this alongside visitors of the quarry utilising the available on street parking also. I am told that JJO are concerned by these proposals and this inevitably impacts upon them and their employment of local people.

Drawing your attention to the guidance PINS guidance 'Procedural Practice in the Examination of Local Plans', it's said at page 10 that (with emphasis added) 'LPAs should rigorously assess the plan before it is published for consultation under regulation 19 to ensure that it is a plan which they think is sound'. I respectfully suggest that the proposed 'Gypsy and Traveller Topic Paper' makes it clear that a rigorous assessment has not been conducted in relation to the proposed site at Futures Park.

Finally, it's clear from the level of support for the petition (including political) that Futures Park is not a suitable location to allocate for a traveller site and the council's acknowledgement that there is 'substantial local opposition' is appreciated.

I therefore object on the basis set out above and reserve the right to amplify, vary or amend this objection. Further, I ask to be kept up to date of the council's progress in (1) submitting the LP to the Secretary of State, (2) publication of the recommendations of the Inspector and (3) if the Plan is adopted at this email address and at the postal address detailed below.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5018**

Brian Michael

Kathy Fishwick

Rossendale Civic Trust

Number of supporters:

Commenting on

HS18

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS18, should it also include access to employment.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5145 Mr	Rob	Wells	Number of supporters:
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Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

With reviewing the Local Plan, I have noted my concerns below and urge the Council to remove the use of Futures Park as a G& T transit site and to reconsider the evidence of need.

My main submission is that the evidence justifying the need is not sufficiently robust to justify the inclusion of a transit site within Rossendale and that therefore, the allocation of a site is removed from the Local Plan. I would propose that a further study is carried out on a cross-authority basis and that the evidence is considered in co-operation with neighbouring authorities to deal with this cross-authority issue.

Please find below my concerns over the Regulation 19 local plan specifically with regards to the HS18 policy and the use of Futures Park for this allocation.

LEGAL

The lack of consultation. The decision to go to regulation 19 consultation with a site that has not been, in any way, raised as part of the regulation 18 consultation has not given the opportunity for local residents and elected representatives to be consulted in a proper manner. Regulation 19 consultation is a much more focused consultation on the three areas -legal, duty to co-operate and soundness. Inserting controversial uses under regulation 19 certainly seems against the spirit of the legislation and against planning policy in provision of traveller sites - 'paying particular attention to early and effective community engagement'.

Restrictive Covenants on 'Futures Park' site. The site was purchased and cleared to create jobs and provide an employment site of a significant size within the borough. Grants were paid out on this basis totalling a reported £5 million. Restrictive covenants are mentioned within the topic paper and the 'title successor' has not been consulted or properly identified. The covenant details from the land owner - RBC - have been requested multiple times but they have ignored requests. This is a concern as this is a material consideration to the soundness of the plan and given RBC's history in managing risk, raises concerns as to 'openness and transparency' of the consultation, especially given the potential for clawback of historical grants.

Contaminated land. The site has been identified as contaminated with heavy metals, hydrocarbons and potentially containing biological pathogens. A ground investigation study from 2013 commissioned by RBC stopped investigating intrusively the plot area identified for the G& T site specifically because of the risk identified of 'anthrax' spores being released. Under the EPA 1990 legislation, RBC is under legal duties to proactively inspect for contaminated land against current use. No evidence of this has been made public in relation to current use, despite multiple requests for information regarding riSK assessments / details of testing regimes since the report was commissioned over five years ago.

SOUNDNESS

WORDING OF POLICY HS18

The requirements of HS18 transit provision contradict each other within the Local Plan. Under HS18 it states a minimum of 4 pitches:

Policy HS18: Gypsies, Travellers and Travelling Showpeople

A Transit site accommodating a minimum 01 four pitches Will be provided on a site at Futures Park. Bacupshown on the PoliCles Map as an Employment Mixed Use site M4.

Yet under the HS2 allocations section, details a maximum of 4 pitches:

This direct contradiction is confusing and indicates that 4 and only 4 pitches will be created. This allows for no room for expansion or reduction with regards to future needs and creates confusion in the minds of anyone responding to the consultation as to what is meant.

EVIDENCE OF NEED

The GTM 2016 assessment

where 'need' is assessed lacks robust evidence for the justification of a transit site to be provided within the Local Plan. The key points in relation to this are:

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- 20% of the key stakeholders have no relevance to the study. The National Bargee Travellers Association (Rossendale Borough does not have any navigable waterways) and the Showman's Guild (when even the report has identified they are of no relevance to Rossendale) distort the relevance of the stakeholder's views.
- Only 20% of the key stakeholders identify that a 'Transit site' would be useful.
- There is no raw data to identify whether the 20% of key stakeholders who were of no relevance to the study are responsible for the 20% of key stakeholders who thought that a transit site would be useful.
- There is no evidence of any of the persons who were part of the 'unauthorised encampments' being approached for their views on needs.
- The date range for evidence within the plan will be six years out of date by the time a decision is made on the recommendations. Latest data specifically shows a halving of the number of illegal encampments over a similar time frame.
- Significant details are missing within the data are present. 25% of the 'Unauthorised Encampments' data is missing!
- The 'Caravan Count' data recorded by RBC questions the reliability of RBC to accurately count caravans or to capture data effectively. This has not been carried out for any of the data range within the report.
- The authors of the report, Arc4, have excluded 'Unauthorised Encampment' activity for other GTAA assessments in relation to Appleby Fair as it distorted the data. In the case for Rossendale's GTAA, the authors have based the assessment on this activity. This shows that inconsistencies in methodology to reach recommendations are present from one of the leading consultancies in this area.
- Arc4 have reached differing recommendations where greater need has been proven, such as consideration to working more closely with other authorities, consideration to the use of a TSOA etc. These options have not been explored in my opinion and with the different range of recommendations within Arc4 reports generally, I question whether they have a standardised methodology for coming to their conclusions or are truly independent in their views.

ASSET UTILISATION

From the unauthorised encampment data provided from the forward Planning team, had the site been provided two years ago, as per the recommendations - 4 pitches with capacity for 8 caravans, the site would have seen less than a 1% utilisation of the asset.

This land is specifically designated as for Employment. This is in extremely short supply in this part of the Borough and with the utilisation being so low, should not be considered for this use.

SITE SELECTION

A basic principle of selecting a site would be to identify the fundamental requirements or need are for such a site. The GTAA 2016 details specifically the considerations to bear in mind when considering site selection quoting previously published guidance in the absence of current specific guidance.

The regulation 18 and now the regulation 19 documents show no evidence that the needs of the fundamental design of a site have been considered in the site selection or the policy. There is no consideration to previously published guidance and in the absence of any current guidance on design, previous guidance should be sought.

The DCLG Designing Gypsy and Traveller Sites - Good Practice Guide 2008 gives an indication of the issues which should form part of any consideration of a traveller site. While this is withdrawn, the HCA published a review of non-mainstream housing design guidance which specifically identifies the DCLG guidance as 'succinctly outlines the physical requirements for site provision for travellers'.

The Reg. 19 plan specifically states the provisions would be 'toilets, water and waste bins would be provided'. There is no evidence that actual end user needs have been sufficiently considered.

This is significantly less than the requirements set out in the two quoted publications above and more resembles a Temporary Stop Over Area than a traveller transit site. TSOA's do not require formalising within a Local Plan as I understand.

The considerations in the topic paper for the comparison of sites look more of a brainstorming session between the ruling party and council officers rather than a coherent strategy for provision.

There is no evidence of a robust methodology followed on site selection. This is contrary to Planning Policy for Traveller Sites 2015.

FUTURES PARK - SPECIFIC CONCERNS OVER SITE SELECTION

Location of the allocation for HS18 within Futures Park has not been disclosed in the local Plan Reg. 19 document. The area contains existing buildings, close proximity to residents housing, established dense woodland with badger setts, a historical landfill site and areas of highly contaminated land.

This risk of contaminated land was considered to be so high that RBC in consultation with the Land Contamination Specialists, stopped intrusive testing of an area within the proximity of the leather waste. They further concluded that the area of land waste was more extensive than previously thought. Currently, erosion of some of the more unstable banks is exposing leather waste within the area.

No discussions or detail has been given as to who would bring this site forward, how it would be done and how much it would cost. The allocation of the transit site is not considered in the suitability and sustainability assessments.

A recent article within the Lancashire Telegraph demonstrates the publicity this site has had with the potential for Anthrax contamination.

The Ground investigation report relating to this area is detailed under the not progressed planning application -link below:

<https://www.rossendale.gov.uk/planningApplication/3436>

Without identification of the location within the Local Plan of the specific area, it can only be assumed that the whole site is allocated to HS18. In this case, the site is located far too close to local residents, is subject to level 3 flood zone and at high risk of surface water flooding. For housing vulnerable people, this does not seem appropriate.

The site which has been identified outside of the consultation document was only presented 3 weeks after being voted through by council (without any papers being presented to members) and is the most contaminated area of Futures Park and has not been considered as part of the sustainability study. This area has been the subject of press articles and radio discussions about the concerns over anthrax spores being present due to the historical landfill use of the land by leather waste.

The area identified within the press release by Rossendale Council looks to be specifically excluded from the Sustainability Appraisal, presumably due to the contamination concerns and not viable for development.

EMP6 - Futures Park policy states the following:

A number of the uses listed in the policy are main town centre uses as defined in the Framework. Development proposals for main town centre uses will be subject to the impact tests set out in the Framework and this local Plan.

Development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance. The development must contribute towards the sustainable use of resources both in design of buildings and layout. Implementation of development must be in accordance with an agreed Design Code/Masterplan.

The second paragraph first line seems at odds with the provision of a gypsy and traveller transit site.

In terms of positive planning, the site was added at the very last opportunity at a time when the Councillor proposing the site was facing pressure from the residents in his area (where he is due for re-election in 2019).

Councillors have stated on record statements like 'If it has to be in anyone's backyard, it should be in the Councils'. Statements such as 'I would oppose the building of this' and that 'there is not even an intention to build this' in the local press are of concern. The fact that 2,000 people have signed a petition against the use of Futures Park is indicative as to how badly this has been planned or consulted upon with the residents and other elected officials. This is more than the number of votes received by any of the local politicians within Rossendale Borough Council and gives an indication as to the irritation residents feel with how this issue has been dealt with by RBC.

ABILITY TO DELIVER THE ALLOCATION

The available plots of land have not been developed for nearly 15 years, despite a number of firms wanting to develop the land. More recently, back in 2013, planning permission was granted for the development of the 'Trail Head' centre, to compliment the Lee Quarry tourist attraction. This was to develop a facility for mountain bikers to embrace tourism and jobs within the area.

This was never progressed due to the contamination of the land at Futures Park. The costs of remediation of the land were considered too high for a commercial venture, let alone a temporary housing allocation that would be used so infrequently.

The proposed location identified outside of the local plan does not have vehicular access, contains thick woodland, significant slopes and unstable land, significant contamination and badger setts. To bring this site forward as deliverable would be uneconomically viable and the potential for clawback of grants shows how flawed the site selection process has been.

The impact on industry, future employment use of the land, tourism and the impact of residents has not been sufficiently considered and in my view, it is unfeasible to consider this site as an option.

Sites have already been excluded due to a few hundred objections. Within 3 weeks, close to a 2000 petition has been signed calling on the Council and MP to stop this site going ahead. The MP is supportive and a groundswell of elected representatives have privately stated their objection to the site being used for this allocation.

Our MP has also stated on record his views to the local press <https://www.rossendalefreepress.co.uk/news/travellers-site-rossendale-not-needed-14981836> which state specifically that within East Lancashire, there are enough G& T sites and that further provision is not necessary. These councils fall under the 1" tier Council, Lancashire, which ensures that there would be no loss of enforcement powers in the event of an existing site being shared with other authorities.

Bacup has a severe shortage of employment land available. There is a desperate need for the retention of large sites within the area for employment. The development of the site as a mixed use site presents inherent problems with future development for employment and could impact future investment.

The site identified is based on a pre-Victorian landfill site. The land is unstable and the site is covered with thick vegetation. The most recent stage 2 environmental study raises concerns over asbestos, heavy metals and VOCs in the area and the potential for biological pathogens (Anthrax) on the land.

The costs to remediate the ground are unknown but anticipated to be high with the nature of the contamination - potential 'Anthrax' contamination, heavy metals, disturbance of the ground risk of exposure and the sites proximity to the River Irwell, local residents on Lee street and Flag street, the categorisation of the site as an Important Wildlife Site and the proximity to the SSSI (Lee Quarry).

DUTY TO CO-OPERATE

Gypsy and Traveller sites within a 15 minute drive are sitting empty and significantly under-used. These are already built, councils have received New Home Bonus money for and are sitting unused.

This excess capacity has been demonstrated in Hyndburn's latest GTAA report. This indicates that the DTC principle is not met and certainly 'no stone has been unturned'.

The evidence within the DTC topic paper is poor with basic errors that I have pointed out, being corrected whilst the document has been out for consultation. No minutes are available for some of

the 'evidence' contained within the topic paper and there is very little documentary evidence that has been brought before Council to indicate that the Duty to Co-operate principle has been met.

These cross authority meetings that have been attended are predominantly by Council officers who have very limited authority to make decisions. To make any substantial progress on the Duty To Cooperate,

this will have to be approved by Cabinet or Council and I see little to indicate that this is the case, especially on the HS18 policy.

In the GTAA 2016 report for Rossendale, this is an example of the failure of the Duty to Co-operate. Transit accommodation for Gypsies and Travellers is clearly a cross-authority issue. Yet, the evidence base used for the identification of need is not a joint exercise. The Greater Manchester GTAA is a good example of best practice - with the small authorities like RBC, it makes little sense to plan for such infrastructure on the basis of Rossendale's identification of need. It would be the equivalent of planning a commercial airport per authority!

The Memorandum of Understanding in appendix 1 is again a good example as to the lack of cooperation with other authorities and lack of detail within the plan:

PARTIES TO THE MEMORANDUM

The Memorandum is agreed by the following Local Authorities:

Insert names

Signed

Annex One - Background Context

BACKGROUND

This is not valid as contains no names or signatures and is indicative as to the rushed way that this document has been put together.

Homes England - have been meeting regularly with RBC but as a result of a failed Empty Homes scheme grant which has cost the Rossendale tax payer £5 million. Homes England (formerly the HCA) were negotiating the grant with RBC due to the potentially criminal negligence demonstrated by RBC in managing the joint project between East Lancs authorities.

My understanding is that court action against other neighbouring authorities has been instigated to recover this extensive loss of public monies that Rossendale have been hit for, with some councils settling out of court. This may be a factor in the lack of co-operation on a clearly cross-authority issue and the confidence others have of working with Rossendale Borough Council.

Do you wish to participate to the Examination In Public? **Yes** Reasons

Futures Park

Reference **15 Mrs Janet Boon** - Number of supporters:

Commenting on travellers site - Futures Park

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

I strongly object to the proposed transit travelling gypsy site proposed for Futures Park. This site was thrown in at the last hour without the recommended time notice being given. Had it have been given adequately then more of the problems that have arisen with the site could have been addressed properly and factually. We understand a feasibility study was taken out on this site. This site is a prime location for the benefit of tourism and financial stability of the town. It is a gateway to a major leisure complex that with the correct knowledge and business etiquette could have formed a major tourist attraction. It is not suitable for a travellers transit site. We are now concerned that contamination of the site was discovered but that steps to remedy this have not been looked into. We also understand that a company was very willing to negotiate and construct a business advantageous to the area but constraints were found. We would like a full and comprehensive report of what and why this happened. We trust the council, government agencies etc to carry out proper procedures, we need to know that these are being adhered to. It has been pointed out that there are other travelling sites within a 10 mile radius of the location where the travellers regularly pitch. Their methods are not legal or ethical. They are breaking the law and if suitable sites are required the proper channels of negotiation need to be entered into, taking resident opinions into account.

In order to comply with the local plan all areas must be researched, resourced and assessed. This has not been done. Soundness denotes a structured and assessed plan. This has not been done.

Do you wish to participate to the Examination In Public? **Yes** Reasons We have questions which need addressing. Why was the feasibility study not acted upon. Why did the company involved in a business venture pull out?

HJ4

Reference **5 Mrs Miriam Kelly** - Number of supporters:

Commenting on - HS18 HJ4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

I live quite close to Futures Park and my family are from Stacksteads so I know the area very well. The site chosen by the Council is not the best for anyone and was done without asking for the opinion of the people of Stacksteads. The first we knew of it was the report of the Council meeting in the Free Press. There has been a lot of posts on Facebook and I signed the petition against the site. You only have to look at the area to see straight away that nothing can be built there. It's woodland with slopes and steep drops where the old tip used to be. and some badgers. The expense of making a site would be huge and the Council needs to spend money on other parts of the town if it has any spare. Some of the travellers are OK but some just make a mess and don't want you to see what they are getting up to. A big group was here in July who tipped trees and bushes on the land and left oil and toilet mess all over the place. The council have now put big stones there to stop them coming. I think we should have been able to have a say like the others did in Whitworth. The council just think the people of Stacksteads will put up with anything.

Do you wish to participate to the Examination In Public? **No** Reasons -

M4

Reference **1 Mrs Pamela Haslam-Jones** - Number of supporters:

Commenting on - HS18 M4

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

The site at Futures park was inserted in a rush at the last minute at a Council meeting on 11 July and supported by the majority party just to have something in the plan, no matter how unsuitable. This happened because there was a protest about their preferred site at Barlow Bottoms and they needed something for the Consultation. The people of Bacup and Stacksteads were not told about this change until after the meeting on 11 July so didn't have the change to comment like the people of Baxenden, Sharneyford and Whitworth did when a site was proposed in their areas. The site wasn't properly researched or assessed before it was included and is completely unsuitable because: 1. It is an area of woodland with such uneven ground and steep edges to the former tip that it would be very difficult and expensive to build a site there. There may be badgers living there also. 2. The area was a rubbish tip for many years and the ground is not stable enough to build on. And there is contamination from factory and other waste on site tipped there over many years. 3. The Council have not taken any notice of a Ground Survey that was done in 2013 which mentioned these problems and advised a complete investigation before anything was developed. 4. It's going to have a bad effect on the mountain bike course which is one of the most important tourist attractions in the area and probably stop the building of the Mountain Bike Centre. 5. Stacksteads has a lot of poor parts and high unemployment. It needs good, positive facilities and developments. This is going to make it much harder to persuade businesses to come to Futures Park. I have lived in Bacup and Stacksteads all my life and know the area well. I don't think this was a sound decision. It was done in a hurry without finding out the problems with the Futures Park site.

The Council should do a proper list of possible sites, be clear about what the issues are around each one in a clear and understandable way. Then allow comments and discussion. Then a suitable site could be included which meets the needs of both Travelers and residents.

Do you wish to participate to the Examination In Public? **Yes** Reasons The inspector should be able to hear the views of local people as this site was included without proper consultation and we did not have any opportunity to raise objections before it was included in the plan.

Reference	3 Mr	Alan Peter	Webb	-	Number of supporters:
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Commenting on	-	HS18	M4
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	No
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The site at Futures Park wasn't properly investigated and publicised before it was included in the plan. The majority party rushed it through at the last minute because their preferred site at Facit fell through because of public opposition. We didn't get a chance to comment on or oppose the plan before it went into this consultation. The site is totally unsuitable for this development. I have lived in Stacksteads all my life and remember it being used as a tip by the local factories and slipper works. It isn't flat enough to be levelled out without a massive amount of money being spent and I believe there is some contamination on the site which would need to be cleared up first. The travellers who come like the site because it has tarmacked roadways which give room for their caravans and they also bring lorries and pickups to carry on their gardening and paving work in the area. Then the garden waste and conifer branches are illegally tipped on the site and the Council has to clear things up. The travellers make a lot of mess and discourage the mountain bikers from using the Lee Quarry tracks which are a big tourist attraction in our area. I am worried that a site here will be a bad influence in the area and encourage more illegal visits. In the end, the Travellers won't get a site here because it will be too difficult and expensive to build. I don't think any of the Councillors really looked at the site before they voted for it. It was just a political thing to get something in the plan.

Choose a site that can be constructed at a reasonable cost.

Do you wish to participate to the Examination In Public?	Yes	Reasons	Because the people of Stacksteads didn't have an opportunity to comment on the adoption of this site before it was put in the plan. Other areas did have a chance when a proposal was near them.
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Reference	4 Mrs	Yvonne	Webb	-	Number of supporters:
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Commenting on	-	HS18	M4
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	No
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Including Futures Park as a Traveller site was done in a panic without much planning or consideration about how suitable it would be. The Councillor from Whitworth was faced with a lot of opposition to putting the site in his own ward so decided to propose the change at a council meeting where it was pushed through on a majority vote along party lines. He was later quoted as saying that it wasn't a proposal or an intention and, if Rossendale planned to build a site at Futures park he would oppose it. The site is totally unsuitable and would cost an enormous amount of money far more than the use it would get. Rossendale BC haven't got the money to build it and no private company would spend hundreds of thousands for hardly any income in return. The whole issue was to get something into the plan so it could go to consultation, however impossible it would be to build the site. The local people are going to be stuck with a proposed site in the area which will never be built. It would be far better for the Council to have proposed something that is already suitable and more realistic to build but they didn't do their homework.

A more realistic proposal. Maybe a stopping agreement like they have in Leeds where my niece lives.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	9 Mr Benjamin Bracwell	-	Number of supporters:
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Commenting on	-	HS18	M4
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Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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I have lived in Stacksteads since the 1950's and me and my son I run a local farm. the back part of futures park is totally unsuitable for a Traveller Site or any other building. The council are want the site to be in the woodland area in the corner of futures parke. This is a nice area of woodland with animals and trees. The area used to be a rubbish tip. The land was the local tip where the bin lorries used to tip waste from houses and we used to dig for bottles. There is a about 30 feett high which is the edge of the old tip. Near this is another tip - right where the site is going to be. All this area is loose stuff and ash - nothing could be built without spending alot of money which the council hasn't got. The travellers like other parts of futures Park because there are the wide roads which can't be sealed off becus the mountain bike boys park there. the travellers make a lot of mess and leave rubbish and tree cuttings for the council to clean up. There is a travellr site right next to our farm but the folks there are Ok and dont cause any trouble. they dont like the futures park lot because they give travellers a bad name.

Find a better place that can be built.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	16 Mr David Syers	-	Number of supporters:
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Commenting on	Chapter1:Policy HS18 & EMP2	HS18 & EMP2	M4
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Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	No
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I believe the proposed site is not viable as a transit site owing to the published Assesment report consisting of old information with missing data. The proposed development would be restrictive and a compromise of Bacup's "prime" employment and industrial area. I understand there are existing covenants and planning conditions in place restricting use of the site. There has been no meaningful, prior consultation with community or Councillors, no apparent due process or prior objective assesments against other sites.

I feel that both policies HS18 and EMP2 should be removed from the Local Plan, owing to the inaccuracies contained therein and the underlying flaws in the required implemetation of process.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	32 Mr	David	Clegg	-	Number of supporters:
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Commenting on	-	HS18	M4
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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I have lived in Stacksteads all my life and know the area well. The location for the traveller site is totally unsuitable as anyone could see immediately if you went there. The Council have proposed it in desperation at the last minute because the other sites they wanted were also unsuitable. They should have found out about the problems with Sharneyford and Facit sites before the plan was put together. The Councillor for Whitworth persuaded his party to reject Facit because of objections in his area but the people of Bacup and Stacksteads never got a chance to comment until it was too late. The area is woodland and part of an old tip that I remember from years ago. To build a traveller site there would be so expensive that it's not economic compared to the use it would get. Even the Councillor who mproposed it has said that he wouldn't support RBC building a traveller site there.

Choose a better site that could be built

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	33 Mr	Philip	Bowden	-	Number of supporters:
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Commenting on	-	HS18	M4
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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The plan is not sound because 1. The list of sites was not prepared properly - accounting for the problems of each site - especially land ownership 2. RBC got into a panic at the last minute when the people of Facit objected to Barlow Bottom where Coun Serridge was up for election next year. So the site was moved to Futures park without any of the public being aware of it. 3. The site is in the far corner of Futures Park which is an area of woodland. RBC don't seem to have thought about the problems of clearing this and the effect on the environment. 4. The site has huge banks of ash from the old tips and it would be very expensive to build anything there. 5. RBC hare supporting the building of a centre for the Lee Quarry Mountain Bike Trail on Futures Park. It's very doubtful if anyone would invest in this or any industry on the site if the plan goes through.

6. Stacksteads has a lot of problems caused bu the decay of the old industries. We need positive things that encourage investment and make the area better. Unfortunately, the travellers have a history in the area of causing problems and will be a negative factor in the area.

Redo this part of the plan with proper preparation.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	48 Mr	Terence C	Haslam-Jones	-	Number of supporters:
Commenting on	-		HS18		M4
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer

My objection is set out in detail in the attached documents:THJObjection.pdfTSAMaps.pdfPlot 5 Summary.pdf(Please see appendix)

The current proposal for a Gypsy and Traveller Site in HS18 should be withdrawn. A separate G&T DPD should be drawn up.

Do you wish to participate to the Examination In Public?	Yes	Reasons	I would welcome the opportunity to discuss this further with a member of the Inspection Team in order to clarify and expand on some of the points I have raised, provide further information and answer questions. I am willing to accompany members of the Inspection Team on their visits to the site
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Reference	49 Mrs	Rebecca	Price	-	Number of supporters:
Commenting on	-		HS18		M4
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer

I was brought up in Stacksteads near Futures Park although I live in Bacup now. My parents still live in Stacksteads. The place chosen for the traveller site isn't suitable as it is in woodland near the Park and I wouldn't like to see the woodland taken away for a traveller site that isn't needed. The labour councillors decided that Futures Park would be a good place because the site at Whitworth was so unpopular with the people there and they were afraid they wouldn't get in if they agreed for it to be there. This part of Bacup has two conservative councillors so they didn't care about the affect. Futures Park was pushed in at the last minute without anyone knowing about it until it was too late. I think this was just a trick to prevent the people of Bacup and Stacksteads having a say. The objection form isn't easy to find and understand and I think this was another trick to stop us objecting. Nobody seems to care about this end of Rossendale and we get a bad deal compared to other parts of the valley. We need jobs and tourism but a Traveler site is going to make this harder to do.

Find a better place to build it.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference **50 Mr Peter Haslam** - Number of supporters:

Commenting on - HS18 M4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The inclusion of the TSA in policy M18 fails all four tests of soundness at NPPF paragraph 35, namely Not Positively Positively Prepared. The identification of a supply of specific and deliverable traveller sites has not been robustly and methodically carried out against consistent criteria related to the Government guidelines as set out in DCLG 'Planning Policy for Traveller Sites 2015'. As a result, several sites proved to be undeliverable during the local plan consultation which was withdrawn in 2015 and during the Regulation 18 Consultation for the current plan. Because of the failure of these sites to be considered deliverable, the Futures Park TSA was included in the Regulation 19 consultation as a hasty and poorly assessed expedient to meet the deadline for inspection. The TSA is not included in the suitability and sustainability assessments and reports relating to the M4 Mixed Employment area, Emp18 Employment Area or in the SHLAA. Therefore, the suitability of the Futures Park TSA was not effectively assessed before its inclusion in Policy M18. The TSA was not included in the Regulation 18 Consultation for the current plan, contrary to the requirement to pay particular attention to early and effective community engagement with both settled and traveller communities. No public information was provided with regard to the inclusion of the Futures Park TSA in the Local Plan before the Regulation 19 Consultation. No engagement with key stakeholders and local groups was undertaken before the Regulation 19 Consultation. This is contrary to RBC's own current, published Statement of Community Involvement. Documentary evidence of the unsuitability of the Futures Park TSA in Ground Investigation Surveys commissioned by Rossendale Borough Council in 1999, 2005 and 2013 was not taken into account in the site selection process. Justified inclusion of the Futures Park TSA in Policy M18 is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. There is specific evidence about the historical use, topography, land stability, contamination, vehicle access, environmental impact and cost of the TSA which has not been considered. Failure to consider this evidence means that the TSA is unlikely to be deliverable or provide an appropriate living environment for travellers. No evaluation of the loss of amenity value of the wooded area on which the TSA is proposed has taken place. No investigation of the effects on habitats and protected species has taken place. Possible restrictive covenants arising from the development of the H4 site by NWDA in 2001-2004 have not been taken into account. The RBC 2016 Gypsy and Traveller Accommodation Assessment section dealing with Transit Sites has been subject to only superficial analysis. Qualitative information and updated data about Unauthorised Encampments does not seem to have been considered. No attempt has been made to engage with transitory travelling families in order to gather evidence on which their needs can be assessed. Effective. The site is likely to be undeliverable over the required period and is unlikely to be granted planning permission. The costs associated with preparing and the developing the site have not been identified. There is no evidence presented that such costs could be met and that the development of the site would be viable. No regard has been given to who would bring forward the development and how would it be done. There has been no evidence of investigation into the effects of the TSA on the development of Employment and Industry on the Futures Park Site (Emp18). There has been no evidence of investigation into the effects of the TSA on the development of the Mountain Bike Trailhead Centre and the use of the Lee Quarry Mountain Bike Trail. These are major parts of RBC's Tourist Policy. The TSA is not included in the Sustainability Appraisal of the Local Plan which deals with site M4 Mixed Employment Area. Consistent with national policy. The inclusion of the Futures Park TSA in Policy M18 is inconsistent with the DCLG 'Planning Policy for Traveller Sites 2015' and earlier guidance. Rossendale Borough Council has not followed DEFRA Contaminated Land Statutory Guidance Relating to The Environmental Protection Act 1990: Part 2A. Rossendale Borough Council has not followed the MHCLG National Planning Policy Framework 2018 Paragraphs 174 and 178.

Prepare a new G&T DPD with a supply of deliverable sites.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **52 Mr Oliver Finnegan** -

Number of supporters:

Commenting on - HS18 M4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I wish to object to the plan to include a Gypsy and Traveller Transit Site at Futures Park as proposed by Rossendale Borough Council in the draft local plan. The part of Futures Park chosen is totally unsuitable for this purpose. You only have to pay a brief visit there to know this. The cost of building a Traveller site would be enormous and not an effective use of resources bearing in mind the potential use. The site hasn't been properly assessed for contamination - I can remember it being used as a landfill area for many years. The inclusion of the site in the Local Plan was a cynical move to get something into the plan, no matter how unsuitable, as other sites had been opposed by local residents in other areas. It's doubtful if we need a site at all. No consultation has taken place about this site until the final stages. The council have a poor record of managing Traveller visits. A Traveller site would have a detrimental effect on the area and Lee Quarry bike trail which is one of Rossendale's key tourist developments.

Do some proper research and build a suitable site .

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	5030	David	Foxcroft		Number of supporters:
Commenting on		HS18		M4	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer

Representation dated 30/09/2018:
Ref – Local Plan consultation

I am writing to you following conversations with many residents across Rossendale in relation to the Local Plan and the latest revision which has now gone out to public consultation. I want to comment on three aspects of the plan and look forward to hearing your response. Whilst the number of properties being asked of in Rossendale is still particularly high I am pleased that since the first publication the Council has worked with our local MP and he has managed to successfully have the numbers for our Borough lowered. It was, however, disheartening to see that some of the biggest areas of concern from the first publication have not been tackled and other changes have been shoe-horned in under the radar.

Looking firstly within my own division. In 2015 and 2017 Planning Inspectors have ruled twice that countryside to the West of Burnley Road should be kept clear of development. At a meeting of the Limey Valley Residents Association in July 2017 the Leader of the Council was quoted as saying that ‘RBC would seek to fulfil its undertaking to allow no significant development to the West of the A682’, and indeed in the first publication this was the case. However, in this second publication (which has a shorter consultation period and almost no public engagement sessions) areas to the West of Burnley Road have been identified for up to 100 homes, additional ‘Emergency Allocation’ and additional smaller areas for housing. Please could you explain what has caused such an about turn from the Council in the intervening 12 months, particularly when the number of homes the Borough is required to provide for in its Local Plan has decreased?

Secondly I have been looking across to Edenfield. In the first publication of the plan it was identified that the land identified in this small village would increase the housing stock in the area by almost 50%, putting a massive strain on the already tight infrastructure. To many people this was (rightly) seen as a significantly unfair demand on such a small area. Residents worked together to provide representations to the Council and there with over 800 objections submitted. Put another way 30% of the total number of responses to the first publication from less than 3% of Borough residents. Given the lower numbers now required myself and others had hoped that common sense would prevail in the second publication. Sadly it appears we were wrong. Please could you explain why such significant views have not been addressed by the second publication when others have, including (a point I’m coming onto) the relocation of the Gypsy and Traveller site?

That brings me nicely to the most controversial change of the all – the proposed location of the Gypsy and Traveller site. To begin with, I’d like to understand how it came to be that at the meeting of the full Council it was proposed to move the location to Futures Park, an idea which hadn’t been published and Officers had had no opportunity to explore. Surely such an action should have been given the time to be properly considered? Perhaps then the Council would not be in the situation it currently finds itself in. Since the meeting 1922 residents have signed the online petition (second only to the number who signed to keep free parking) and a small group of residents have started to do the Councils homework for them.

If we look back to 2013 Ride-On put forward a planning application to develop part of the site and create a new Trail head centre. As part of that application a Ground Investigation report was carried out on behalf of the Borough Council. This report makes for some very disturbing reading particularly in relation to Plot 5 (in the Local Plan map published to identify the proposed location for the Gypsy and Traveller site this is listed as Plot 3, however when comparing both maps it is quite clear they are one and the same). The report states when discussing plot 5 that ‘An area of leather waste contamination present advised to be 550m2; possible contamination by volatile organic compounds (VOCs) noted.’. Further into the report it then reads ‘Leather waste has been reported in one area which may have resulted in the presence of a range of pollutants

associated with various tanning processes as well as generation of polluting leachate and hazardous ground gas from the degradation of the organic material present. Leather waste may also be associated with anthrax spores, which may remain viable for decades under certain conditions.’.

As I am sure you can imagine this makes for incredibly disturbing reading and many residents are struggling to see how this situation has been allowed to happen, or why the site is still open to the public given the gravity of the findings. Since the publication of the report please can you confirm if and when the site has been properly cleared and made safe? If this hasn’t taken place please could you confirm why it hasn’t and why the site is still open to the public? From initial research the residents have undertaken it appears that this hasn’t happened which has the potential for significant issues for residents in the area. Indeed I have heard from residents of children being on the site and picking berries that have grown in the area! Another question which I think residents need to know the answer to is how a situation arose where Councillor Sean Serridge, Deputy Leader of the Council in 2013 at the time of this report, came to propose this as a viable solution for the location of the Gypsy and Traveller site, which was originally planned to have been proposed to be in his Ward? Given the significance of the report he must have known about the issues it highlighted and that these were potentially still to be addressed. How was this allowed to happen?

I look forward to hearing from you in due course in relation the concerns raised.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons
Number of comments in this section 21

Comments on policy HS19 Specialist Housing

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rosendale Civic Trust** Number of supporters:
Commenting on HS19

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support HS19 provided it recognises a distinction between Circular 82/69 Category 1 and 2 housing for old people who are mostly able bodied and in retirement and other extra care CQC regulated accommodation proposed for these 3 sites.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5154 Mr Philip Carter	Environment Agency	Number of supporters:
Commenting on	HS19		
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer
		Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>Our previous comments on the Regulation 18 consultation stated that sites HS2.19 and HS2.90 are allocated for specialist housing but located within Flood Zones and are constrained by the presence of main river watercourses.</p> <p>We are aware that site H22 (HS2.19) has been subject to a planning application and development has been approved following EA consultation.</p> <p>Issue Site H53 (HS2.90) remains in Flood Zone 3, has not been assessed through the SFRA and continues to be allocated for a more vulnerable land use without sufficient evidence. Until it can be shown that the site can be developed safely, we must object to this allocation.</p> <p>Impact The LPA cannot demonstrate that these sites satisfy the sequential test and that sufficient evidence is available to allow the LPA to be satisfied they could satisfy the exception test.</p> <p>Solution Provide sufficient evidence that this site complies with the NPPF and that it can be developed safely. This evidence could be in the form of a supplement to the SFRA where necessary.</p>			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons	

Reference	5173	Taylor Wimpey	Number of supporters:
Commenting on	HS19		
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer
		Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>LAND AT GRANE ROAD, HASLINGDEN</p> <p>Policy HS19: Specialist Housing</p> <p>2.83 We welcome the Council's decision to allocate specific sites for specialist accommodation, namely in the form of retirement accommodation, extra care accommodation and supported accommodation services. Indeed, this approach means that the most suitable sites, which have taken into consideration factors such as accessibility and location, have been identified which can specifically cater for this housing need group in the most appropriate manner.</p> <p>LAND WEST OF MARKET STREET, EDENFIELD</p> <p>Policy HS19: Specialist Housing</p> <p>2.72 We welcome the Council's decision to allocate specific sites for specialist accommodation, namely in the form of retirement accommodation, extra care accommodation and supported accommodation services. Indeed, this approach means that the most suitable sites, which have taken into consideration factors such as accessibility and location, have been identified which can specifically cater for this housing need group in the most appropriate manner.</p>			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons	

Number of comments in this section 3

Comments on policy	HS20	Self Build and Custom Built Houses
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Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
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Commenting on	HS20
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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RCT support HS20

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference	5157 Ms	Joanne	Harding	Home Builders Federation	Number of supporters:
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Commenting on	HS20
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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Policy HS20: Self-Build and Custom-Built Houses

Policy HS20 is not considered to be sound as it is not positively prepared or effective for the following reasons:

This policy looks for schemes comprising of 50 dwellings to make at least 10% of plots available for sale to small builders or individuals or groups who wish to custom build their own homes. Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF are, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. However, the Council's approach is restrictive rather than permissive by encouraging the inclusion of such housing on sites of 50 dwellings or more. This policy approach only changes the house building delivery mechanism from one form of house building to another without any consequential additional contribution to boosting housing supply.

The HBF would recommend appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities. The HBF would also be interested to see the evidence to support the idea that those wanting to self-build would actually consider building within a larger housing development.

Do you wish to participate to the Examination In Public?	Yes	Reasons
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Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

HS20

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy HS20: Self Build and Custom Built Homes

2.84 Taylor Wimpey welcome the Council's identification of suitable land to accommodate self-build and custom built houses. Indeed, three housing allocations have been identified specifically for this type of housing and we fully agree with this approach.

2.85 In light of this, we are unsure why the policy then also requires developers to make at least 10% of plots available for sale for self/custom build. Whilst this policy suggests that this will be encouraged as opposed to required, it is considered that the appropriate mechanism to deliver self-build and custom-built homes is through specific allocations, as proposed here, rather than a prescriptive requirement for each and every allocated site in the Local Plan.

2.86 Requiring private developers to provide service plots available for sale within every housing scheme will place and unnecessary constraints and burdens on those housebuilders and could potentially lead to delays in delivery while those plots are being marketed; particularly where there may be little market demand. Indeed, the explanatory text to Policy HS20 explains that evidence from the SHMA indicates that the level of demand for self-build plots is currently low in Rossendale.

2.87 As such we would request that the allocations remain, but the 10% requirement be removed. Then through preparation of a self-build and custom build housing register, the Council can continue to effectively monitor demand for self-build and custom homes through the process and identify additional sites for this purpose if necessary.

LAND WEST OF MARKET STREET, EDENFIELD

Policy HS20: Self Build and Custom Built Homes

2.73 Taylor Wimpey welcome the Council's identification of suitable land to accommodate self-build and custom built houses. Indeed, three housing allocations have been identified specifically for this type of housing and we fully agree with this approach.

2.74 In light of this, we are unsure why the policy then also requires developers to make at least 10% of plots available for sale for self/custom build. Whilst this policy suggests that this will be encouraged as opposed to required, it is considered that the appropriate mechanism to deliver self-build and custom-built homes is through specific allocations, as proposed here, rather than a prescriptive requirement for each and every allocated site in the Local Plan.

2.75 Requiring private developers to provide service plots available for sale within every housing scheme will place and unnecessary constraints and burdens on those housebuilders and could potentially lead to delays in delivery while those plots are being marketed; particularly where there may be little market demand. Indeed, the explanatory text to Policy HS20 explains that evidence from the SHMA indicates that the level of demand for self-build plots is currently low in Rossendale.

2.76 As such we would request that the allocations remain, but the 10% requirement be removed. Then through preparation of a self-build and custom build housing register, the Council can continue to effectively monitor demand for self-build and custom homes through the process and identify additional sites for this purpose if necessary.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section 3

Chapter 2: Employment Growth and Employment

Comments on policy EMP1

Provision for Employment

Reference **5018**

Brian Michael

Kathy Fishwick

Rossendale Civic Trust

Number of supporters:

Commenting on

EMP1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support EMP1 and note: The Council's Employment Land Review (ELR) (2017) identifies an overall lack of good quality small to medium-sized industrial premises for industrial and manufacturing (B2 and B8), which is suppressing demand. The high levels of manufacturing and industrial uses, and the need to export products, means that the need for industrial premises is greatest in the west of the Borough where there is ready access to the A56 and M66.

In terms of office uses, activity is generally focused to the west of the Borough around Rawtenstall and Haslingden. Whilst there is a current oversupply in the short term the ELR evidences a need for new office accommodation (B1a) in the longer term to meet the forecast growth in the service sector, and suggests that this could be located in Rawtenstall.

RCT note a need to appreciate, that as with comparison goods, Rossendale neighbours are more likely to be chosen for larger office users. The LCC involved development at Rising Bridge remained vacant, and became mostly occupied by LCC.

RCT have seen occasional planning applications for so called "live work" developments, and can't see this supported in these policies. They have potential as a buffer between employment and housing sites.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5148** **Edenfield Community Neighbourhood Forum** Number of supporters: 1213

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy EMP1: Provision for Employment

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy

68. This policy sets an employment land target of 27 hectares which is not adequately justified by the supporting text and the Employment Topic Paper has not been published alongside this Local Plan consultation.

69. The policy does not provide any breakdown of B1, B2, B8 land or any land for non-B jobs. Nor does the policy or explanatory text explain how these figures equate to job numbers in the Borough.

70. There is approximately 20ha of land that has been identified for employment use in the Local Plan but has not been allocated.

71. There is no analysis provided in terms of how the employment land and jobs would (or would not) balance with the Local Plan target in the Local Plan and what the implications would be for transport movements within the Borough and surrounding sub region.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5176 Mr Warren Hilton** **Highways England** Number of supporters:

Commenting on EMP1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

‘Strategic Policy EMP1: Provision for Employment’ sets out the Borough’s need for 27 hectares of land for business, general industrial or storage and distribution (Use Classes B1, B2 and B8) employment sites for the period up to 2034. ‘Policy EMP2: Employment Site Allocations’ provides detail of the employment site allocations and potential Land Use Class. The changes included within the errata document for Table 2 have been noted. Several employment sites are located adjacent to the SRN. Highways England has previously indicated that ‘Policy Circular 02/2013’ sets out a presumption against new accesses and junctions being created on highspeed routes such as the A56(T). Whilst access via new junctions on the A56(T) have been considered within the Interim Rossendale Employment Sites Study, all accesses directly onto the SRN were subsequently ruled out due to not being in accordance with the Department for Transport Policy Circular 02/2013, and we are still awaiting the updated employment site study (and geotechnical assessments) to fully understand where new access junctions have been proposed and if they are deliverable.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 3

Comments on policy EMP2 Employment Site Allocations

EE20

Reference **5193**

Brilie Properties Ltd

Number of supporters:

Commenting on

EE20

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan comply with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. This Representation is in relation to the Council's Publication Pre-Submission version of the Plan (Regulation 19). The consultation period ran from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses as identified on the draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation.

BACKGROUND

1.4 Hourigan Connolly is instructed by Brilie Properties Ltd, the owners of the subject site, to review and comment on the emerging Local Plan in relation to the site known as Wavell House on Holcombe Road, Helmshore. The site is proposed for allocation as 'Existing Employment' under site reference EE20 in draft Policy EMP2 Employment Site Allocations.

1.5 The site is currently in office use, occupied solely by Rossendales Ltd. under a contractual lease with an initial break in 2021. Unfortunately, Rossendales have recently served Notice on the owners indicating that the company is relocating and that they intend to leave site by December 2018. Thereafter, the site will become completely vacant.

1.6 The owners of the site may consider the Change of Use of the building and car park to residential use under Permitted Development via the Prior Notification Procedure but also wish to promote the site for a housing allocation in the emerging Local Plan. This Representation will demonstrate its suitability for residential use.

1.7 It should be noted that the land owner only became aware that Rossendales were vacating the site in July 2018, otherwise they would have engaged with the Council during the previous consultation stages of the Local Plan.

SITE CONTEXT

1.8 The 0.48 hectare site lies on the western side of Holcombe Road to the south west of Helmshore. The site comprises Wavell House, a two storey building and a large car park to the rear. A further

building is located in the car park area. The building adjoins a mill building to the north which reaches four storeys in height and is currently being converted to dwellings. To the east and south are residential dwellings and to the west, set above the site, is open countryside. An aerial view of the site is shown below.

Figure 1.1 Location of subject site, Wavell House, Holcombe Road.

Figure 1.2 Street view showing Wavell House (looking north west along Holcombe Road).

SCOPE

1.9 In preparing these submissions we have reviewed the documents forming the evidence base that underpins the emerging Local Plan.

OVERVIEW

1.10 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Council's such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The Framework (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018 however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.1 Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making. The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development. These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different

opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.
- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.
- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159) business (Paragraphs 160), infrastructure (Paragraph 162) and environment (Paragraph 165).

HOUSING

2.21 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.22 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- “meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand”.

BUSINESS

2.23 Paragraph 160 of the Framework outlines the importance of local planning authorities having a clear understanding (from a robust evidence base) of business needs within the economic markets operating in and across their area.

2.24 Paragraph 161 of the Framework establishes the importance of understanding business needs (both quantitative and qualitative) and ensuring that sufficient suitable land (both existing and future) is available to meet needs.

INFRASTRUCTURE

2.25 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.26 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.27 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.28 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.29 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report, in particular paragraph 030 (reference ID: 3-030-20140306 confirms):

“Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.30 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306):

“WHAT CONSTITUTES A ‘DELIVERABLE SITE’ IN THE CONTEXT OF HOUSING POLICY?”

Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.”

2.31 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that:

“HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?”

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.32 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.33 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which were submitted before 31 March 2018.

2.34 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.35 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

2.36 Crucially the link between housing growth and economic activity must be recognised and therefore the current consultation is considered to be relevant to this Representation in relation to land at Wavell House.

3. POLICIES PROPOSED IN THE DRAFT LOCAL PLAN PROPOSALS MAP

3.1 The below image shows the site in the draft Proposals Map. The proposed employment allocation is annotated as EE20 (light purple). Our client’s land sits within that allocation. The balance of the allocation is being converted into residential use by others via the Prior Notification Procedure (PN Ref: 2013/0426).

Figure 3.1 Extract from Draft Proposals Map.

3.2 As well as being allocated for employment, the site falls within the Urban Boundary (red line).

3.3 A new conservation area is proposed in Helmshore (dashed black line) however Wavell House is outside this boundary. We fully support the site being excluded from the conservation area as it offers no contribution to the special character of the area.

POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

3.4 Draft Policy EMP2: Employment Site Allocations identifies all sites within the Borough which have been allocated for employment development. For each site allocated, site area and proposed use class is set out within the allocations table.

3.5 Wavell House is identified as part of an employment allocation under reference EE20 as shown below. It is classed as an ‘Existing Employment’ site and is considered suitable for B1, B2 and B8 uses.

Figure 3.2 Extract from Employment Site Allocations Table (Policy EMP2).

3.6 We support the general aims of the Local Plan to identify key development sites which are central to the delivery of the overall strategy for new and existing employment assets and the Borough’s economy. The delivery of appropriate uses in the right locations is crucial to the economy. However, in this instance, part of the proposed allocation has already changed to residential use and the balance, our client’s site, is soon to become vacant with no realistic prospects of re-use for employment.

EMPLOYMENT LAND REVIEW 2017

3.7 The table below, taken from the Council’s Employment Land Review (2017), shows how the Council scores the site against the various employment criteria.

Figure 3.3 Extract from Employment Land Review 2017.

3.8 Whilst the site is given an overall rating of “Average”, the site scores poorly against “Market Attractiveness.” The Employment Land Review recommends that the site is retained for employment use, however, as discussed below, we do not consider this to be a positive strategy in the Local Plan.

3.9 As presented previously, the site is currently in office use, occupied solely by Rossendales Ltd. Despite being tenants at the site for some time, and being significant employers in the area, Rossendales have recently informed the land owner that they will be relocating and will be seeking an early break by 31 December 2018.² This is due to Rossendales deciding to centralise their business and as such Wavell House no longer serves their needs. We have been informed that no redundancies will be made as part of this change, however Wavell House will become totally vacant when Rossendales leave the site.

3.10 With the site due to become unoccupied, it is highly likely it will remain vacant for the foreseeable future given its unattractiveness to the market. Wavell House is outdated and requires significant modernisation to be brought up to modern office standards, the cost of which would not be viable for the landowner. For these reasons, it is our view that the site should not be retained as an employment allocation under draft Policy EMP2. Indeed, the whole allocation is no longer appropriate.

FALL BACK POSITION

3.11 Given that the site will soon become vacant, our clients have considered the future of the site owing to its limited attractiveness to the market (as acknowledged by the Council in their own ELR) and the likely cost associated with bringing the outdated offices up to modern standard. One option are those Permitted Development rights conferred under Class O of Part 3 to Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015, which would allow the change of use of the land and buildings at Wavell House to residential use without the need for Planning Permission. This represents the landowner’s fall-back position. Whilst the right would be subject to a Prior Approval Procedure requiring the submission of details relating to transport and highway impacts, contamination risk and flooding risks, it is our view that this would most likely be a formality, particularly in light of the Permitted Development Right already exercised and being implemented in the adjacent property to the north. In the spirit of proper planning, our client’s preferred course of action would be to secure an allocation for residential use and work with the Council to deliver a suitable residential scheme.

3.12 The site comprises brownfield land, in a sustainable location, within the urban area and is therefore considered to be an entirely appropriate site to contribute towards the Borough’s housing need over the Plan Period. This is considered in further detail in Section 5 of this Representation.

4. SOUNDNESS ASSESSMENT

INTRODUCTION

4.1 As mentioned in Chapter 2 Paragraph 182 of the 2012 Framework deals with the examination of Local Plans. Local Planning Authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

4.2 In this section we consider the soundness of the Draft Local Plan Policies against the four key tests set out under Paragraph 182 of the 2012 Framework. It should be noted that for a Plan to be found sound it must comply with all of the four tests set out under Paragraph 182 of the Framework.

POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

POSITIVELY PREPARED

4.3 As demonstrated in Chapter 3 the site is soon to become completely vacant with the sole tenant due to leave at the end of the year. Whilst the site has benefited from Rossendales being long term tenants, with their departure the building would have to be completely modernised to attract a new tenant. The costs to modernise the building is not viable for the landowner. Therefore, it is our view that Policy EMP2 has not been positively prepared as it allocates the site for employment use where there are no real

prospects of this use continuing. If the landowner had been aware of this impending change in circumstances they would have made Representations to this effect during the consultation period of the Regulation 18 version of the draft Local Plan and promoted the site for housing.

JUSTIFIED

4.4 Policy EMP2 is not justified as it allocates the site for employment use where there is no reasonable prospect of the site being used for employment use once the existing tenants vacate Wavell House at the end of the year.

EFFECTIVE

4.5 The preceding sections of this document have explained how Wavell House is not suitable for employment use; it is therefore not effective. With the existing tenants due to leave the landowner no longer wishes to use the site for employment as it would not be viable. The landowner is aware of their permitted development rights to convert the building to residential use which they will pursue if necessary (as done by the landowner of the adjoining building to the north). This further renders the employment allocation ineffective. However, as discussed previously, a more positive and Plan-led approach would be to remove the employment allocation and reallocate the site for housing.

CONSISTENT WITH NATIONAL POLICY

4.6 As we have set out that there is no reasonable prospect the site being used for employment use therefore Policy EMP2 is not consistent with Paragraph 22 of the Framework: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

PROPOSED MODIFICATION

4.7 The Council is respectfully requested to remove the current employment allocation EE.20 from Policy EMP2 and allocate the site for residential development under draft Policy HS2. Appendix 2 contains an illustrative layout which shows that 14 dwellings can easily be accommodated on the site, however to allow some flexibility we request that the allocation allows for up to 16 dwellings. Residential development in this location is considered appropriate in order to facilitate the viable regeneration of the site.

4.8 We contend that this would properly reflect Paragraph 22 of the Framework which seeks to avoid the long term protection of employment uses where there is no reasonable prospect of a site being used for that purpose. In such circumstances, more appropriate and viable uses, such as housing, should be acceptable.

6. CONCLUSIONS

6.1 The starting point for consideration of the Council's Local Plan is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 The Framework is clear at Paragraph 22 that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Paragraph 160 outlines the importance of local planning authorities having a clear understanding of business needs within the economic markets operating in and across their area.

6.3 It has been highlighted in this Representation that the Wavell House is going to become vacant with Rossendales terminating their lease at the end of 2018. As a result, and in order to futureproof the site, removal of the proposed employment allocation is recommended, and a residential allocation should be considered in order to promote sustainable residential development. Land at Wavell House has an opportunity to contribute to the delivery of housing over the Plan period on a site which comprises previously developed land within the Urban Boundary.

6.4 In conclusion, Local Plan Policy EMP2 should be modified to remove reference to EE20 Wavell House and the site should be allocated for housing for up to 16 dwellings under Policy HS1. The Proposals Map should be amended to reflect this

6.5 The site is available, deliverable and achievable, subject to the above provisions.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

EE30

Reference **5192**

B&E Boys Ltd

Number of supporters:

Commenting on

Toll Bar Business Park, Stacksteads

EE30

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. A previous consultation on the draft Local Plan (Regulation 18) was undertaken in summer 2017 in which Hourigan Connolly submitted representations in relation to Toll Bar Business Park. This Representation is in relation to the Council's Publication Pre-Submission version of the Plan (Regulation 19). The consultation period ran from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses, as identified on the draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation.

BACKGROUND

1.4 Hourigan Connolly is instructed by B&E Boys Ltd to review and comment on the emerging Local Plan in relation to the site known as Toll Bar Business Park on Newchurch Road, Stacksteads.

The site is allocated for employment use under draft Policy EMP2 and given the Employment Allocation Reference EE30. Part of the site is also allocated as a Neighbourhood Parade under draft Policy R1. This Representation sets out why the Council should reallocate the land for housing.

1.5 A title plan is provided at Appendix 1 to indicate the location of the site and to demonstrate that the site is within a single ownership, however Figure 1.1 below is also provided for assistance to illustrate the location of the site in Stacksteads Ward:

Figure 1.1 Location of subject site, Toll Bar Business Park, Newchurch Road (circled in red).

Figure 1.2 Street view showing Toll Bar Business Park looking south west along Newchurch Road

SITE CONTEXT

1.6 The 0.8 ha site lies on the southern side of Newchurch Road, close to the junction with Booth Road, with vehicular access taken directly from this main road. The site is located approximately 1.6 km from the centre of Bacup town and comprises a large five storey mill building, smaller mill building additions, newer single and two storey industrial buildings, with large areas of hardstanding to the rear used for storage and car parking.

1.7 The site is occupied in part by existing commercial businesses, but much of the floorspace in the upper storeys of the large mill building are unoccupied and have remained vacant for a long period of time due to the condition of the building and its suitability for modern-day commercial practices.

1.8 The owners of the site therefore wish to promote the site for a housing allocation in the emerging Local Plan and this Representation will demonstrate its suitability for this use as the site is located in the Urban Boundary, in a sustainable location, and on a main arterial route in the Borough.

SCOPE

1.9 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

1.10 This document follows earlier Representations made by Hourigan Connolly as part of previous consultation stages in the Local Plan process.

OVERVIEW

1.11 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy

Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

1.12 The emerging Local Plan will be examined by an independent inspector whose role is to assess whether the plan is sound. We will demonstrate in this Representation that the Plan is not sound as draft Policies EMP2 and R1 have not been positively prepared, are not justified, not effective and are not in accordance with national policy.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Council's such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The Framework (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018, however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.¹ Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making. The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development.

These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by

creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.
- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.
- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on conservation (Paragraph 126), retail (Paragraph 23), business (Paragraphs 160), infrastructure (Paragraph 162) and environment (Paragraph 165).

CONSERVATION

2.21 Chapter 12 of the Framework focuses on conserving and enhancing the historic environment - Paragraph 126. The Framework is clear that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment and in doing so they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. However, in developing this strategy, Paragraph 126 also states the following:

“...local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made.”

2.22 Paragraph 129 further states:

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”

2.23 With regards the state of a heritage asset, Paragraph 130 is clear that: “Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.”

2.24 Paragraph 131 addresses what local planning authorities should take account of when determining planning applications:

“In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.”

RETAIL

2.25 Paragraph 23 confirms that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should (amongst other things) recognise town centres as the heart of their communities and pursue policies to support their viability and vitality, and define a network and hierarchy of centres that is resilient to anticipated future economic changes. The Framework is clear that it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability.

HOUSING

2.26 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.27 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- “meets household and population projections, taking account of migration and demographic change; addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand”.

BUSINESS

2.28 Paragraph 160 of the Framework outlines the importance of local planning authorities having a clear understanding (from a robust evidence base) of business needs within the economic markets operating in and across their area.

2.29 Paragraph 161 of the Framework establishes the importance of understanding business needs (both quantitative and qualitative) and ensuring that sufficient suitable land (both existing and future) is available to meet needs.

INFRASTRUCTURE

2.30 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.31 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the

European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.32 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

“Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.33 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.34 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report, in particular paragraph 030 (reference ID: 3-030-20140306 confirms):

“Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.35 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306):

“WHAT CONSTITUTES A ‘DELIVERABLE SITE’ IN THE CONTEXT OF HOUSING POLICY?”

Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.”

2.36 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that:

“HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?”

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.37 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the

White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.38 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which were submitted before 31 March 2018.

2.39 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.40 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

2.41 Crucially the link between housing growth and economic activity must be recognised and therefore the current consultation is considered to be relevant to this Representation in relation to land at Toll Bar Business Park.

3. POLICIES PROPOSED IN THE DRAFT LOCAL PLAN

PROPOSALS MAP

3.1 The below image shows the site in the draft Proposals Map. The proposed employment allocation is annotated as EE30 (light purple hatching).

Figure 3.1 Extract from draft Proposals Map.

3.2 As well as being allocated for employment, the site is also within the Urban Boundary (red edge) and the frontage of the site is designated as a Neighbourhood Parade (purple edge)

POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

3.3 Draft Policy EMP2: Employment Site Allocations identifies all sites within the Borough which have been allocated for employment development. For each site allocated, site area and proposed use class is set out within the allocations table.

3.4 Toll Bar Business Park is identified as Employment Allocation Ref. EE30 as shown below. It is classed as an 'existing employment' site and is considered suitable for B1, B2 and B8 uses.

Figure 3.2 Extract from Employment Site Allocations Table (Policy EMP2)

3.5 We support the aims of the Local Plan to identify key development sites which are central to the delivery of the overall strategy for new and existing employment assets and the Borough's economy. Crucial to the economy is the delivery of appropriate uses in the right locations.

3.6 The Toll Bar Business Park site is in single land ownership, being solely within the ownership of B&E Boys Limited. The site is located on Newchurch Road, the main through-route between Rawtenstall and Bacup. The site is dominated by a five storey mill building which is positioned at the back of the pavement on Newchurch Road. There are a smaller number of car parking spaces located directly off Newchurch Road in front of the building. The frontage of the site extends along Newchurch Road where the mill building reduces in height to four stories to the south-east, and to two stories in the north-west corner.

3.7 Part of the main existing mill building is a Grade II Listed Building. The Listing Entry is contained in Appendix 2. The mill, known in the Listing Entry as 'Stacksteads Mill' was listed in 1984 and was built by the brothers Robery and John Munn. The mill was originally a cotton spinning mill dating to 1833. The Listing Entry makes it clear that the main mill building, the former engine house at the west end and the extension to the mill in the north west corner form part of the Listed Building, with all other built form (i.e. the former weaving sheds, modern office block at the east end, and the extension at the south west corner) not included in the entry.

3.8 Vehicular access is taken directly from Newchurch Road adjacent to the two storey building in the northwest corner of the site and opens up to a large area of hardstanding located to the rear of the buildings on site. Access is restrictive due to the orientation of existing buildings on site - vehicular access is a prohibitive feature to attracting prospective commercial tenants.

3.9 Toll Bar Business Park is only partly occupied by commercial and industrial operators. The rent received by the tenants is significantly below the current market rent. As the years have passed, demand for upper floor space has dropped significantly, if not completely, other than the likes of boxing / karate clubs, artists, or dance / fitness studios who can only afford nominal rents.

3.10 We have been informed by the landowner that Toll Barr desperately needs significant maintenance works including re-roofing the whole building which is estimated to be at least £500k. There is also major works required to the main core of the building as in large parts, the mill is now becoming infested with wet and dry rot to many of the main timber supports. Many of the single storey northern light roofs at the mill have suffered from years of lead thefts and vandalism causing thousands of pounds worth of damage that really now requires serious investment to make the buildings water tight to allow higher grade of tenants to potentially take occupancy.

However, the rental uplifts are unachievable given the quality of other more modern, clear span portal framed buildings in the Borough.

3.11 The building has a very old sprinkler system, that is antiquated and desperately requires upgrading along with the lift which although maintained on a regular basis, will soon need to be replaced at over £100k, or completely closed off as a facility for the upper floor units.

3.12 Due to the above, many of the units are vacant despite continual advertising with "To Let" signs being clearly visible on the front of the building.

3.13 In short, the site does not operate on a financially viable basis. We do not consider that the proposed allocation for B1, B2 and B8 uses will secure a viable use or investment in the site going forward. As referred to in the Policy Explanation of draft Policy EMP2, much of the committed supply of employment sites is not considered to be fit for purpose, and is often in the wrong location with sites to the west of the Borough being more attractive due to better links to the A56 and M66. This is the case with the subject site.

EMPLOYMENT LAND REVIEW 2017

3.14 The Council's Employment Land Review 2017 scores the site poorly against the various employment criteria and gives an overall rating of Poor as shown below.

Figure 3.3 Extract from Employment Land Review 2017

3.15 This further demonstrates that the site is not suitable for employment purposes. Despite scoring poorly the Employment Land Review recommended that the site is retained for employment which is not justified.

3.16 To this end we consider that it would be more appropriate for the employment allocation to be removed and for the site to be allocated for residential development. The site comprises brownfield land, in a sustainable location within the urban area and is therefore considered to be entirely appropriate to contribute towards the Borough's housing need over the plan period. This is considered in further detail in Sections 4 and 5 of this Representation.

POLICY R1: RETAIL & OTHER TOWN CENTRE USES

3.17 The draft Proposals Map (Figure 3.2 above) shows that part of the site which fronts onto Newchurch Road, is included in a Neighbourhood Parade. In addition to the site being promoted for a housing allocation, we wish to oppose the designation of part of the site being located within a Neighbourhood Parade.

3.18 Chapter 3 of the Draft Local Plan relates to Retail, with draft Policy R1: Retail and Other Town Centre Uses confirming that Neighbourhood Parade boundaries are identified on the Proposals Map, including Stacksteads.

3.19 The Policy states that development proposals will be expected to maintain or strengthen the retail offer and vitality and viability of Neighbourhood Parades. The Policy further states that:

"Proposals that require planning permission which would result in the loss of A1 uses in the PSA of the town, district and local centres will only be supported where:

- It would make a positive contribution to the vitality and viability of the relevant centre;
- It would not result in a significant break in retail frontage or lead to the loss of retail floorspace at a scale that would be harmful to the shopping function of the centre or which would reduce the ability of local communities to meet their day-to-day needs within the centre;
- It is compatible with a retail area and would maintain an active frontage and be immediately accessible to the public from the street; and
- There would be no significant adverse impacts on the character of the area, the amenity of local residents, road safety, car parking or traffic flows."

3.20 Whilst the frontage of the subject site has been included as a Neighbourhood Parade the building is not suitable for such a retail use and offers no active frontage. This is

reflected in the fact that was not allocated for retail use in the adopted version of the Proposals Map2.

3.21 As previously mentioned the site is only partially occupied and the rental income is not viable. It is a dated premises which lacks modern facilities, safe car parking areas and is difficult to access for deliveries and other servicing purposes. It does not have an active frontage onto Newchurch Road as shown below (with a large part of the site actually having a blank frontage) and therefore would not maintain or strengthen the retail offer in Stacksteads.

Figure 3.4 Street view looking east along Newchurch Road

3.22 The loss of these units from this part of the Stacksteads Neighbourhood Parade would not harm the objectives of draft Policy R1 as the loss of these inadequate retail premises would not harm the shopping function of the centre, nor would it reduce the ability of the local communities to meet their day-to-day needs within the centre. The majority of the frontage is currently not in retail use, nor has it ever been. Indeed, this could only be achieved through the demolition of the existing buildings. Unfortunately, as evidenced by the parade of vacant shops further towards Rawtenstall, along Newchurch Road, demonstrates the difficulty of operating a viable retail business in this location. Simply designating a frontage will not create retail activity, nor will it protect existing retail uses; there are none. Perversely, therefore, the designation of retail frontage by the Council must accept the redevelopment of the subject site, which would involve the demolition of the listed building to have any chance of being successful. The evidence on the ground suggests retail use success would not be forthcoming without demolition and redevelopment of it all. With demolition being required in principle, the retention of the listed building, in this instance, should not preclude redevelopment for any viable use. In our opinion, the only viable use of the site is for housing.

3.23 The proposed Stacksteads Neighbourhood Parade designation extends along Newchurch Road to the west and east of the subject site. There are natural breaks in built form either side of the subject site i.e. to the west (adjacent to the Rose 'N' Bowl public house where the Toll Bar building gable end meets the public right of way between the subject site and the public house), and to the east (to the rear of properties on Commercial Street). The Toll Bar Business Park effectively sits on its own and does not form part of a row of shops and could therefore easily be excluded from the proposed Neighbourhood Parade.

3.24 To that end, the Neighbourhood Parade designation should not extend into the boundaries of the subject site to enable the full and proper redevelopment of the subject site for alternative uses such as housing.

4. SOUNDNESS ASSESSMENT

INTRODUCTION

4.1 As mentioned in Chapter 2 above Paragraph 182 of the 2012 Framework deals with the examination of Local Plans. Local Planning Authorities are required to submit Plans for examination which they consider "sound" – namely that they are:

- "Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework".

4.2 In this section we consider the soundness of the Draft Local Plan Policies against the four key tests set out under Paragraph 182 of the 2012 Framework. It should be noted that for a Plan to be found sound it must comply with all of the four tests set out under Paragraph 182 of the Framework.

POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

POSITIVELY PREPARED

4.3 As demonstrated in Chapter 3 the site is not suitable for employment purposes. The site is only partly occupied and the owners are receiving nominal rent. The building is in a poor state of repair and the owners are maintaining the building at significant cost. There is no prospects of this situation improving therefore the site does not operate on a financially viable basis. It is our view that Policy EMP2 has not been positively prepared by allocating the Toll Bar Business Park as an existing employment site under reference

EE30. On this basis alone, the Council's Pan is unsound.

JUSTIFIED

4.4 Policy EMP2 fails to plan for the proper growth of Stacksteads as it allocates the site for employment use where there is no reasonable prospect of the site being used for employment. In addition to our Representations that the site is not suitable for continued employment use, the Council's own Employment Land Review in 2017 gives an overall site rating of Poor therefore the policy has not been justified in our view. The Council's strategy for Stacksteads is not the most appropriate available, it will fail to deliver sustainable development and consequently it is unsound.

EFFECTIVE

4.5 The preceding sections of this document have explained how Toll Bar Business Park is not suitable for employment use; it is therefore not effective.

CONSISTENT WITH NATIONAL POLICY

As we have set out that there is no reasonable prospect the site being used for employment use therefore Policy EMP2 is not consistent with Paragraph 22 of the Framework: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."

PROPOSED MODIFICATION

4.6 The Council is respectfully requested to remove the current employment allocation EE.30 from Policy EMP2 and allocate the site for residential development under draft Policy HS2. Residential development in this location is considered appropriate in order to facilitate the viable regeneration of the site.

4.7 We contend that this would properly reflect Paragraph 22 of the Framework which seeks to avoid the long term protection of employment uses where there is no reasonable prospect of a site being used for that purpose. In such circumstances, more appropriate and viable uses, such as housing, should be acceptable.

POLICY R3: RETAIL

POSITIVELY PREPARED

4.8 As demonstrated in Chapter 4 Toll Bar Business Park is not suitable for being allocated within a Neighbourhood Parade. The site is only partially occupied and the rental income is not viable. It is a dated premises which lacks modern facilities, safe car parking areas and is difficult to access for deliveries and other servicing purposes. It does not have an active frontage onto Newchurch Road and therefore offers nothing in terms of retail to the area. For these reasons Policy R3 has not been positively prepared by allocating Toll Bar Business Park as a Neighbourhood Parade.

JUSTIFIED

4.9 Policy R3 fails to plan properly for Stacksteads as it allocates part of the site as a Neighbourhood Parade where there is no justification or prospect the site would be suitable for retail. The site does not provide traditional retail frontage and should therefore be excluded from being allocated as a Neighbourhood Parade.

EFFECTIVE

4.10 The preceding sections of this document have explained how Toll Bar Business Park is not suitable to be allocated as a Neighbourhood Parade; it is therefore not effective.

CONSISTENT WITH NATIONAL POLICY

4.11 As we have set out the Toll Bar Business Park is not suitable to be included in a Neighbourhood Parade. It is our view that this does not represent sustainable development and therefore does not comply with paragraph 151 of the Framework:

"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development."

PROPOSED MODIFICATION

4.12 The Council is respectfully requested to remove the site for being allocated as a Neighbourhood Parade in the Proposals Map and allocate the site for residential development under draft Policy HS2. Residential development in this location is considered appropriate in order to facilitate the viable regeneration of the site.

5. PROPOSED HOUSING ALLOCATION: TOLL BAR BUSINESS PARK

SITE CONTEXT

5.1 The site at Toll Bar Business Park represents an opportunity to deliver truly sustainable residential development. As already highlighted, the site is partly occupied by a number of commercial businesses located in the various buildings spread across the site, however the upper floors of the main, large mill building have been unoccupied for many years despite constant marketing.

5.2 The site is in single land ownership, being solely within the ownership of B&E Boys Limited. The extent of the area we request the Council allocate for housing is edged in red on the Title Plan contained in Appendix 1. As previously identified, the site is located on Newchurch Road, the main through-route between Stacksteads and Bacup. It is dominated by a five storey mill building which is positioned at the back of the pavement on Newchurch Road.

5.3 Part of the main existing mill building is a Grade II Listed Building.

5.4 In terms of topography, the site is relatively flat and there is a small number of low quality trees within the site boundaries. There is also a culvert which runs through the site in a north east to south-westerly direction and links into the River Irwell which is located south of the site.

DRAFT POLICY HS1 – MEETING ROSSENDALE’S HOUSING REQUIREMENT

5.5 Draft Policy HS1 sets out the Council’s approach to ‘Meeting Rossendale’s Housing Requirement’. It states that at least 3,180 additional dwellings will be provided over the plan period (2019-2034). The draft policy also seeks to deliver over 30% of new dwellings on previously developed land across the Borough.

5.6 In this context, land at Toll Bar Business Park could make an important contribution towards meeting the Borough’s residential development needs. In particular, as it is recognised within the explanatory text that brownfield sites within the urban area are limited.

SUSTAINABLE HOUSING ALLOCATION

5.7 The site is located in a very sustainable location, being positioned on a main bus route through the Rossendale Valley and being within close proximity to local services and amenities in Stacksteads and nearby Bacup (which is circa 1.6 km away), including, within walking distance, a Primary School. Adjacent to the site is a public house (the Rose ‘N’ Bowl), a bowling green, and playing fields at Stacksteads Recreation Ground. The site is adjacent to residential properties located on Commercial Street, Stuart Avenue and Miles Avenue. In this regard, the residential redevelopment of the site would be complementary to existing surrounding uses.

SHLAA 2018 UPDATE

5.8 The site is identified in the SHLAA 2018 Update under the site reference SHLAA16093. The site assessment for the Toll Bar site can be found in Appendix 4. The SHLAA highlights that the site is located well to most local services. The site assessment concludes that the site is deliverable within the next 5 years and generates a yield of 38 dwellings. The SHLAA recommends that developing the site should include the conversion of the Mill as part of it is a Grade II Listed Building however this is not viable as discussed below.

LISTED BUILDING

5.9 As discussed in the technical note from Nexus Heritage in Appendix 3 the Council has a duty to protect, conserve, preserve and enhance Rossendale’s historic built environment and their settings. However this does not necessarily preclude the loss of listed buildings providing appropriate mitigation of impacts are undertaken. This balanced approach is consistent with the Framework (paragraph 133) which notes that where a proposed development will lead to the loss of a designated heritage asset, the Council should refuse consent, unless it can be demonstrated that the total loss is necessary to achieve substantial public benefits that outweigh that loss.

5.10 The building is in a poor state of repair and the current owners are maintaining the building at significant cost and generating below market rents, on the basis of significant under-occupancy and the type of tenant willing to rent such a building. As mentioned previously the building is not fit for modern employment use and the structural works required to the building are not financially viable.

5.11 The presence of the mill buildings are preventing the sustainable regeneration of the site. Redeveloping the site for housing is the only viable option and would allow much needed housing to be delivered in a sustainable location within the urban boundary. In our view this is a significant public benefit. If the site is not redeveloped soon, it will continue to fall in to disrepair which is not a positive strategy for the Local Plan.

SUMMARY

5.12 The Representation presents an opportunity to contribute to the delivery of sustainable housing over the next 15 years, i.e. during the current Plan period, or beyond. The subject site comprises previously developed land, within the Urban Boundary, in a sustainable location and therefore would accord with the principles of sustainable development as set out in the Framework, for which there is a presumption in favour of.

5.13 To conclude, for the reasons discussed above, in our view the site at Toll Bar Business Park should be allocated for housing in the emerging Local Plan.

6. CONCLUSIONS

6.1 The starting point for consideration of the Council’s Local Plan is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 The Framework is clear at Paragraph 22 that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Paragraph 160 outlines the importance of local planning authorities having a clear understanding of business needs within the economic markets operating in and across their area.

6.3 It has been highlighted in this Representation that the Toll Bar Business Park site is no longer appealing to modern businesses. As a result, and in order to future-proof the site, removal of the proposed Employment and Neighbourhood Parade allocation is recommended, and a residential allocation should be considered in order to promote sustainable residential development. Land at Toll Bar Business Park has an opportunity to contribute to the delivery of housing over the Plan period on a site which comprises previously developed land within the Urban Boundary.

6.4 In conclusion, Local Plan Policy EMP2 should be modified to remove reference to the Toll Bar Business Park site and the Proposals Map amended to reflect this and also remove the site from being within Neighbourhood Parade to allow a more flexible approach for redevelopment of the site over the plan period. Further, the site should be considered for allocation under draft Policy HS2 for residential development.

Appendix 1 Title Plan

Appendix 2 Listing Building Entry

Appendix 3 technical Note from Nexus Heritage

Appendix 4 SHLAA 2018 Update Extract

Please see appendix

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

EE37

Reference **65 Mr Robert O’Shaunessy Voith Paper Ltd** Number of supporters:

Commenting on - - EE37

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

Please see submission (Please see appendix)

Amend housing and employment land allocations accordingly.

Do you wish to participate to the Examination In Public? **Yes** Reasons **To state the case for an amendment to the plan**

Reference **5192****B&E Boys Ltd**

Number of supporters:

Commenting on

EE40

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. The most recent consultation on the draft Local Plan was undertaken in summer 2017 and comprised the Regulation 18 stage. This Representation is submitted in response to the Council's current Publication Pre-Submission version of the Plan (Regulation 19). The consultation period runs from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the adopted Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses, as identified on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation. For clarification, the Council's Errata to the Publication (Pre-Submission) version of the Local Plan (dated 03 September 2018), has been noted but it does not relate to the matters pertinent to this particular Representation.

BACKGROUND 1.4 Hourigan Connolly is instructed by B&E Boys Ltd in respect of its land interests at Riverside Business Park, Townsend Fold, Rawtenstall. 1.5 B&E Boys' land interest is identified outlined in red in Figure 1.1 below. The land shown to the east of the River Irwell (the former mill site) comprises Riverside Business Park. The land to the west of the River Irwell, excluding the former mill pond comprises the land the subject of this representation, hereafter referred to as "the site".

1.6 Riverside Business Park sits within the Urban Boundary. The subject site sits adjacent to the Urban Boundary and is located within the Green Belt. The latest iteration of the Council's Green Belt Assessment refers to that part of the site within the Green Belt as Parcel Ref. 19.

1.7 This Representation sets out why the Council should remove the site from the Green Belt, include it within the Urban Boundary and allocate the land for employment use to accommodate the expansion of a successful employment site and offer the potential for an important local business to expand in-situ.

Figure 1.1 – Land at Townsend Fold, Rawtenstall – not to scale.

1.8 B&E Boys supports the allocation of the Riverside Business Park site for employment uses as identified in the draft Local Plan (Policy EMP3, site EE40). The remainder of this Representation therefore focuses on that part of the site which is currently in the Green Belt, which the owners wish to promote for employment allocation.

SCOPE

1.9 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

OVERVIEW

1.10 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Council's such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The National Planning Policy Framework (hereafter referred to as the Framework) (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018, however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.¹ Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making.

2.12 The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.13 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.14 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development. These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.15 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.16 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.17 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.

- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.

- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.18 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.19 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;

- the provision of retail, leisure and other commercial development;

- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- the provision of health, security, community and cultural infrastructure and other local facilities; and

- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.20 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions:

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.21 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159), business (Paragraphs 160 – 161), infrastructure (Paragraph 162) and environment (Paragraphs 165 – 168).

GREEN BELT

2.22 In respect of Green Belt Paragraph 80 of the Framework lists the five national purposes of the Green Belt as follows:

- To check the unrestricted sprawl of large built-up areas;

- To prevent neighbouring towns merging into one another;

- To assist in safeguarding the countryside from encroachment;

- To preserve the setting and special character of historic towns; and,

- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.23 Paragraph 83 goes on to state that Local Planning Authorities (LPA’s) with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

2.24 Paragraph 84 states when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

2.25 Paragraph 85 sets out that when defining new Green Belt boundaries LPA’s should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;

- not include land which it is unnecessary to keep permanently open;

- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
 - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- 2.26 define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

BUSINESS

2.27 Paragraph 160 of the Framework outlines the importance of local planning authorities having a clear understanding (from a robust evidence base) of business needs within the economic markets operating in and across their area.

2.28 Paragraph 161 of the Framework establishes the importance of understanding business needs (both quantitative and qualitative) and ensuring that sufficient suitable land (both existing and future) is available to meet needs.

INFRASTRUCTURE

2.29 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.30 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.31 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.32 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.33 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report

2.34 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that: “HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?”

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the

date of adoption.”

2.35 Crucially the link between housing growth and economic activity must be recognised and is relevant to this Representation in relation to land at Townsend Fold.

3. THE SITE

SITE LOCATION

3.1 The site’s general location is identified below in Figure 3.1.

Figure 3.1 – Land at Townsend Fold, Rawtenstall– not to scale.

3.2 The existing business park is located to the south of Holme Lane, with the remaining Green Belt land located to the west. Bury Road is located a short distance to the east, providing links into Rawtenstall to the north and to Edenfield, and beyond, to the south.

3.3 As is evident from the aerial image above, land to the west of Riverside Business Park has a close physical relationship with the existing built up part of the settlement, which is further reinforced by the A56 and A682 which both provide a physical boundary to the west.

SITE DESCRIPTION

3.4 The site which is the subject of this representation is located within the Green Belt. It is bordered by the existing business park and associated employment units to the east and Holme Lane to the north. There are fields to the north west and north of the site, although beyond this is the A682 and buildings at Holme Farm/Holme Manor. There is further greenfield land to the south of the site. The River Irwell runs along the eastern boundary of the Green Belt parcel, separating it from the existing Riverside Business Park and forming a defensible boundary to the south.

CURRENT OCCUPIERS

3.5 The existing employment site is fully occupied by a range of businesses. Most notably the site is home to Lucite International which produces chemical solutions for sports pitch markings (amongst other things). The firm has seen rapid growth over recent years and requires larger premises to accommodate the growing business. Their preference is to remain at the current site, however, if premises are not forthcoming on this site they will be forced to look elsewhere and, given the lack of modern and accessible premises in Rossendale, this inevitably means relocating to outside the Borough. The land owner is keen to meet Lucite’s requirements, however, it can only do so with some expansion into the Green Belt.

SURROUNDING AREA

3.6 The subject site is located adjacent to Riverside Business Park which is currently utilised for various employment uses, by a variety of occupiers. Further to the east, is an established residential area in this southern part of Rawtenstall. Importantly, the site is separated from the main residential area by the business park.

3.7 Holme Manor Retirement Centre lies to the north west of the site, though there is an area of separation between the site boundary and the retirement centre.

3.8 To the south of the site is open countryside, though this is sandwiched between the A56 and Bury Road in this location.

3.9 Rawtenstall town centre lies to the north east, offering a range of services and facilities.

3.10 This unremarkable site has a close physical relationship with the existing settlement and it does not relate to the wider countryside which is largely located to the south.

FLOOD RISK

3.11 According to the Flood Map for Planning provided by the Environment Agency, the majority of the site lies within Flood Zone 1. Parts of the existing employment site fall in Flood Zone 2 and a narrow channel following the course of the River Irwell is within Flood Zones 2 and 3.

Figure 3.2 – Extract from Flood Map for Planning

LANDSCAPE

3.12 The Council commissioned a Landscape Character Assessment in 2015. The document separates areas of the Borough into various landscape character types. The subject site which is located on the edge of the urban area of Rawtenstall broadly falls into an area identified as ‘Settled Valley’, on the edge of an area identified as ‘Industrial Age’ and in close proximity to an area of ‘Suburban’ landscape. The area is not identified as one which is of particular value.

Figure 3.3 – Extract from Landscape Character Area Plan (with footpaths) and Key

3.13 The Landscape Character Assessment goes on to assess specific sites in relation to their development potential, although land at Townsend Fold is not considered in detail in this regard. An area close to the site to the east was, however, assessed – land at Haslam Farm. It was concluded that parts of this site were suitable for development and this would have a negligible impact upon the surrounding landscape with mitigation measures in place.

PUBLIC RIGHTS OF WAY

3.14 Footpath number 14-4-FP309 runs through part of the business park as shown in Figure 3.4 below (albeit this is marked on the key as a temporary closure), but there are no public right of way running through the Green Belt land.

Figure 3.4 Extract of Lancashire County Council's PROW Mapping

AGRICULTURAL LAND QUALITY

3.15 According to the agricultural land quality database, land in this area is considered to be of poor or very poor value. This is identified in Figure 3.5 below.

ECOLOGY

3.16 The site is not a statutory Ecological or Heritage asset neither is it within 1 km of a National Nature Reserve, Ramsar Site, Site of Special Scientific Interest or Special Protected Area.

HERITAGE

3.17 Holme Bridge which is located to the north of the site on Holme Lane is Grade II Listed (Listing ID: 185784 Holme Bridge). The listing text states the following: Bridge, probably late C18. Coursed simply-dressed sandstone. Vernacular materials used in formal style: 2 segmental arches with rusticated voussoirs, a pilaster at each end and another to the pier, which has a cutwater; band, and slab-walled parapet (part replaced by rubble).

SUMMARY

3.18 In summary, none of the statutory or other designations identified would preclude development of the site.

4. GREEN BELT ASSESSMENT

4.1 As part of the evidence base to inform the emerging Local Plan, a Green Belt Review was carried out by LUC with the final report being published in November 2016. The purpose of the review was to carry out an independent and comprehensive assessment of Green Belt within the Borough to inform the preparation of the new Local Plan. One of the key aims of the review was to provide clear conclusions on the relative performance of Green Belt which will enable Rossendale Borough Council to consider whether there are 'exceptional circumstances' (as per Paragraph 83 of the Framework) to justify altering Green Belt boundaries through the Local Plan process to meet development needs.

4.2 As previously identified, the Framework sets out five purposes of the Green Belt as follows:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and,
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.3 In common with other studies we have reviewed, the LUC Green Belt Assessment firstly establishes Green Belt parcels – in this instance there are 80 parcels included within five broad areas of Green Belt. In that respect the subject site falls within Parcel 19, as identified below.

Figure 4.1 Extract from Green Belt Review (2016) - Green Belt Parcels around Rawtenstall

4.4 Parcels were formed through the identification of land that contains the same or very similar land uses or character bounded by recognisable features. These features are described as:

- Natural features i.e. substantial watercourses; and
- Manmade features i.e. motorways A and B roads, railways.

4.5 Less prominent features such as walls, woodland, hedges, tree lines, streams and ditches were also considered where other more permanent boundaries were not present.

4.6 Two types of parcel were identified:

- Areas adjacent to built up areas (relatively small parcels); and
- Broad areas of Green Belt that may be more remote from settlement.

4.7 The boundary of Parcel 19 is identified in further detail in Figure 4.2 below.

Figure 4.2 Extract from Green Belt Review (2016) identifying Parcel 19 with the site outlined in red.

4.8 An assessment has then been made by LUC as to the ratings of the Green Belt parcels in Rossendale against the first four objectives of including land within the Green Belt as set out in Paragraph 80 of the Framework.

Figure 4.3 Extract from Green Belt Review (2016) – Overall Assessment Table

Figure 4.4 Extract from Green Belt Review (2016) – Parcel Ratings

4.9 It can be seen in Figure 4.3 that the Council's Green Belt Assessment for Parcel 19 concluded that the parcel has a 'strong' role in relation to Purpose 2, a 'moderate' role in relation to Purpose 3 and 'no contribution' in relation to Purpose 4. Purpose 1 was considered to be 'not applicable' given the nature of the urban area of Rawtenstall. Purpose 5 is not detailed within the table given that all sites have been considered as equal in this regard.

4.10 Our response is detailed below.

PARCEL 19

4.11 The assessment for Parcel 19 states that it lies on the edge of Rawtenstall within the green gap between Rawtenstall and Haslingden.

4.12 In our view Parcel 19 is far too broad a study area which has led to skewed conclusions being reached by LUC. In our opinion there is a clear distinction between the northern most part of Parcel 19 to that in the south.

4.13 In that respect we comment on the conclusions reached by LUC below, with specific reference to the site.

PURPOSE 1: TO CHECK THE UNRESTRICTED SPRAWL OF LARGE BUILT UP AREA

4.14 As identified within the assessment of the subject site, the land lies on the edge of Rawtenstall which is not considered as a 'large built up area' and so the checking of unrestricted sprawl of such a built up area is not relevant in this instance. In any event, even if this purpose were considered appropriate, the physical barrier of the pond, A56 and A682 to the west and the existing field boundary demarcating our client's ownership to the south, ensures that development of the subject site would not result in unrestricted sprawl.

4.15 Result: No contribution.

PURPOSE 2: TO PREVENT NEIGHBOURING TOWNS MERGING INTO ONE ANOTHER

4.16 Clearly development of the subject site would not result in the merging of towns as a matter of fact as the site is physically well contained by the pond, A56 and A682 to the west and field boundaries to the south. Within the Council's assessment, it is stated that the parcel has an important role in maintaining a gap between Rawtenstall and Haslingden, however we consider that this gap would be maintained in any case due to the existing built development and road infrastructure.

4.17 Result: No contribution.

PURPOSE 3: TO ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT

4.18 In our view the site does not assist in safeguarding the countryside from encroachment. Due to the site's proximity to the business park and its various employment uses, the nearby roads and indeed residential development in close proximity, the character of the subject site does not have a strong rural character. There is no basis for the Council considering that this site has a moderate role in this regard.

4.19 The site is enclosed and has strong defensible boundaries which would safeguard the countryside from encroachment. This is particularly the case for the northern part of Parcel 19 containing the site to which this representation relates and this highlights the issues that can occur when too large a Green Belt parcel is considered together without further assessment, resulting in inaccurate conclusions.

4.20 Result: No contribution.

PURPOSE 4: TO PRESERVE THE SETTING & SPECIAL CHARACTER OF HISTORIC TOWNS

4.21 The analysis in the Green Belt Review considers our client's site to make no contribution to this purpose. We agree with this conclusion.

4.22 Result: No contribution.

PURPOSE 5: TO ASSIST IN URBAN REGENERATION BY ENCOURAGING THE RECYCLING OF DERELICT & OTHER URBAN LAND

4.23 It is noted that in line with the methodology all sites have been considered as having an equal contribution to this purpose, though it is not stated what this is.

4.24 Result: Equal contribution.

COMPARISON SITES

4.25 Figure 4.3 below identifies other Green Belt sites in and around Rawtenstall and Haslingden which have been assessed as part of the Green Belt Review. The plan also goes further to identify those sites which are considered potentially suitable for Green Belt release and subsequently for development (these sites are identified in blue).

Figure 4.5 Extract from Green Belt Review (2016) – Sites Considered to be suitable for Green Belt Release

4.26 Given the specific nature and characteristics of the subject site, in particular adjacent to a successful employment site with occupiers seeking to expand their existing premises, it is difficult to consider other sites which may serve these needs. Indeed, if forced to move from one site in Rawtenstall to another, there is the possibility that businesses could be attracted to other areas outside of the Borough.

4.27 With reference to the draft Policies Map we note that the Council is proposing to remove two sites from the Green Belt in the immediate vicinity of the subject site and proposing their employment allocation.

Figure 4.6 Extract from Policies Map

4.28 Site NE4, immediately to the north of the subject site and NE1 to the south, which form part of Parcels 18 and 26 respectively are both proposed for removal. Parcel 26 was deemed suitable for removal in the Green Belt Review, given its containment by the River Irwell, road network and railway line and we concur with this approach.

4.29 Parcel 18 however, scored worse in the assessment than Parcel 19 containing the subject site (see Figure 4.3 above) but in that instance, the Council has considered a discrete part within Parcel 18 for release. We agree with that approach and consider that part of NE4 that currently lies within the Green Belt as being suitable for removal. Indeed, we would argue that the whole of Parcel 18 is suitable for removal given that all that remains, after the proposed allocation is removed, are existing buildings and associated structures.

4.30 We simply contend that the exact same approach should be taken with the subject site; the northern most part of Parcel 19 does not perform a Green Belt function and this discrete part should be considered in isolation.

OVERALL ASSESSMENT OF THE SUBJECT SITE

4.31 We consider the assessment which has been carried out for the subject site, which comprises part of the land included within Parcel 19, to be flawed as it overestimates the value of the Green Belt in this location. There are distinct differences between the land included in the northern part of the parcel and that in the south, with the north more akin to Parcel 18 in terms of their relationship to existing built development.

4.32 We advocate that our client's land makes no contribution to four of the purposes of including land in the Green Belt and the remaining purpose 5 cannot be used for assessment purposes as all of the sites in the Borough are given equal weighting.

4.33 In line with the Council's methodology the overall assessment for our client's site should therefore be "weak".

4.34 We consider the subject site as an appropriate site for release from the Green Belt as it is adjacent to the settlement boundary and is controlled by defensible boundaries and has existing development on 3 sides. The site would form a logical extension to the south of Rawtenstall and in particular to the established employment site at Townsend Fold.

5. SOUNDNESS ASSESSMENT

INTRODUCTION

5.1 As mentioned in Chapter 2 above Paragraph 182 of the 2012 Framework deals with the examination of Local Plans. Local Planning Authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

5.2 In this section we consider the soundness of the Draft Local Plan Policies against the four key tests set out under Paragraph 182 of the 2012 Framework. It should be noted that for a Plan to be found sound it must comply with all of the four tests set out under Paragraph 182 of the Framework.

STRATEGIC POLICY SD2: URBAN BOUNDARY AND GREEN BELT

POSITIVELY PREPARED

5.3 The Plan as drafted currently improperly considers the Green Belt credentials of the subject site by failing to assess the discrete characteristics of the relevant Parcel. In doing so it fails to plan for the expansion of a successful employment area in a sustainable location. 5.4 The Plan also identifies certain other employment allocations, which, on the evidence now before the Council, will plainly not come forward, or be retained, for employment use. 5.5 With this in mind, the Local Plan in its current form is not positively prepared and the Council must consider the discrete elements of the identified Green Belt parcels in more detail identify additional development opportunities that may well be currently within the Green Belt but nonetheless represent opportunities for sustainable development. JUSTIFIED 5.6 Consequently, Strategic Policy SD2 fails to plan for the proper growth of the Borough as it does not identify all available opportunities to meet employment requirements on land that may currently lie outside of the Urban Boundary. This does not represent an appropriate strategy in the case of the subject site and its continued inclusion within the Green Belt is not justified.

EFFECTIVE

5.7 As set out above, the approach to the Green Belt fails to effectively consider the subject site. The approach may lead to an under supply of employment land and the failure of the Plan to deliver. PROPOSED MODIFICATION

5.8 To be consistent with national policy, the Council is respectfully requested to extend the urban boundary so that the site is included within it and removed from the Green Belt.

POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

POSITIVELY PREPARED 5.9 The Plan includes several employment sites with questionable delivery credentials and therefore may fail to meet objectively assessed development needs. Similarly, opportunities to provide new employment land in successful, market-attractive and sustainable locations have been missed. In that regard, the subject site is available and deliverable 5.10 The Local Plan in its current form is not positively prepared.

JUSTIFIED 5.11 Policy EMP2 fails to plan for the proper growth of the Borough as it does not identify all available opportunities to meet employment requirements. This does not represent an appropriate strategy in the case of the subject site and its continued inclusion within the Green Belt is not justified.

EFFECTIVE 5.12 Policy EMP2 includes sites that, on the evidence available, will not come forward, or be retained, for employment use. The Plan fails to identify sufficient sites to allow for this potential under delivery, which may lead to an under supply of employment land and the failure of the Plan to deliver and be effective.

PROPOSED MODIFICATION

5.13 To be consistent with national policy, the Council is respectfully requested to allocate the subject site for employment use.

6. PROPOSED EMPLOYMENT ALLOCATION

SITE CONTEXT

6.1 The subject site at Townsend Fold represents an opportunity to deliver truly sustainable employment development. As already highlighted, the Riverside Business Park site is

successful and occupied by a number of commercial businesses located in the various buildings spread across the site, however there is demand for further employment space on the site but it is full.

6.2 Riverside Business Park's success is based upon its location. It is situated off Bury Road, Rawtenstall and offers easy access to the town centre facilities including banks, post offices, shops and cafes. It is also within easy reach of the motorway networks, with the A56 providing good links to both the M65 and M66. As a result, the site is within easy reach of Manchester, Bolton, Blackburn, Bury, Rochdale, Burnley and beyond.

6.3 Units at Riverside Business Park are reasonably modern with good access for goods vehicles and ample parking. Current tenants range from shoe manufacturers, furniture makers and, notably, Lucite International, a high-tech company who has received a Queens Award for Innovation. As previously detailed, Lucite International is seeking to extend its but find their options limited at Riverside. Unfortunately, if their requirements cannot be met within the existing site they will inevitably be looking for alternative premises, potentially outside of the Borough. Given the rapid decline in industry in the Borough of Rossendale, the retention of successful businesses such as this one is key to the Borough's future prosperity.

6.4 Setting aside the subject site's Green Belt credentials, we contend that the expansion of an existing successful employment area with the potential to facilitate the expansion of a successful, growing company in situ and retain their presence in the Borough amounts alone to exceptional circumstances to justify the release of the subject site from the Green Belt.

6.5 Both the existing employment site (EE40) and the adjoining Green Belt land (the subject site) are in single land ownership, being solely within the ownership of B&E Boys Limited.

POLICY EMP1 – PROVISION FOR EMPLOYMENT

6.6 Policy EMP1 sets out the Council's approach to 'Provision for Employment'. It states that the Council will seek to provide sufficient land to meet the Borough's requirement of 27 hectares for business, general industrial or storage and distribution (Use Classes B1, B2, B8) for the period up to 2034.

6.7 Within the explanatory text it is identified that, as evidenced by the Employment Land Review (2017), there is a lack of good quality small to medium sized industrial premises (B2 and B8 uses) which is in turn suppressing demand. It is further identified that the need for industrial premises is greatest in the west of the Borough where sites benefit from good access to the A56 and M66.

6.8 It is generally recognised that Rossendale has seen a significant decline in employment levels since 1997, however it still has an active industrial market and suitable and sufficient premises need to be provided in order for the Borough to remain competitive.

POLICY EMP2 – EMPLOYMENT SITE ALLOCATIONS

6.9 Draft policy EMP2 allocates sites for employment use over the plan period, including both existing sites and new allocations. The existing employment site at Townsend Fold is referred to under draft Policy reference EE40 'Riverside Business Park'. It is stated that the site is suitable for B1, B2 and B8 uses and the total site area is 6.04ha.

6.10 The site is identified on the Policies Map extract at Figure 4.6 above.

6.11 We support the continued allocation of this site for employment uses, as recommended in the Employment Land Review (2017). It enjoys high levels of occupation and indeed requires expansion in order to meet the demands of current occupiers. The site has good links to A56 and the M66 beyond this and therefore demand from occupiers has remained high in comparison to other more limited parts of the Borough.

6.12 The long-term prospects of the business park are however, dependent upon the ability for expansion.

A SUSTAINABLE EXTENDED EMPLOYMENT ALLOCATION

6.13 The existing Riverside Business Park represents a prime opportunity for expanding an existing successful employment location for the benefit of the Borough as a whole and, in particular, to offer the opportunity for a local high-value business to expand in situ.

6.14 The site is located in a very sustainable location, in close proximity to Rawtenstall Town Centre and with good road and motorway links to destinations further afield. Despite being within the urban boundary of Rawtenstall, the employment site sits well with nearby residential uses and is separated by the physical presence of the railway line to the east of the site.

- 6.15 The proposed expansion site, whilst currently in the Green Belt, does not perform well against the established Green Belt purposes. The site is well contained by existing road infrastructure and provides an opportunity for sensitive expansion of the existing business park, without being detrimental to the Green Belt or other surrounding uses.
- 6.16 The expansion of the existing business park would not only provide more space and better quality employment units, but any capital generated would also help to improve the existing units making them more attractive to occupiers and further securing the long term future of Riverside Business Park.
- 6.17 This proposal presents an opportunity to ensure the continued delivery of a sustainable and successful employment site over the next 15 years, which will in turn make a significant contribution to Rossendale Borough's economy and attract further investment. The subject site and the case made for development therefore presents the exceptional circumstances as set out in the Framework which would allow an amendment to the Green Belt boundary through the preparation of a new Local Plan.
- 6.18 To conclude, for the reasons discussed above, in our view the site at Riverside Business Park should be extended to allow for a more substantial employment allocation in this area.

SUGGESTED MODIFICATION

6.19 The Council is respectfully requested to extend the current employment allocation EE40 to include the land within the ownership of B&E Boys Ltd outlined in red at Figure 4.2 above and amend the Green Belt and Urban Boundaries boundary accordingly to create a new employment allocation. The extension of this existing employment site is considered entirely appropriate in order to secure the long-term future of the site and ensure that Rawtenstall (and the Borough more widely) is able to retain important local employers.

6.20 We contend that this would properly reflect the provisions of Paragraph 83 of the Framework which sets out that amendments to Green Belt boundaries can only be made in exceptional circumstances and through the local plan process. In addition, the amendment to the Green Belt boundary in this instance would be fully in accordance with Paragraph 84 of the Framework which sets out that such amendments should only be made to facilitate sustainable development patterns.

7. CONCLUSIONS

7.1 The starting point for consideration of the Council's Local Plan is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

7.2 The Framework is clear at Paragraph 83 that Green Belt boundaries can be amended in exceptional circumstances, through the Local Plan process. Paragraph 84 further states that this can only be done in order to facilitate sustainable development.

7.3 It has been highlighted in this Representation that the land adjacent to the existing Riverside Business Park does not meet the five purposes of the Green Belt as set out in Paragraph 80. As a result, and in order to facilitate the expansion of a sustainable existing employment location with the potential to help retain and meet the growth requirements of an important employer, we respectfully request that the subject site, as broadly identified outlined in red at Figure 4.2 above, be allocated for employment use. Through implementing this sustainable extension, land at Riverside Business Park has an opportunity to be a significant contributor to the local economy in Rawtenstall, and the Borough of Rossendale more widely.

7.4 In conclusion, Local Plan Policy EMP2 should be modified to include land to the west of Riverside Business Park as a new employment allocation and this land should be removed from the Green Belt and included within the Urban Boundary accordingly.

7.5 The site is available and deliverable, and capable of being developed for employment purposes during the Plan period

MODIFICATION

5.8 To be consistent with national policy, the Council is respectfully requested to extend the urban boundary so that the site is included within it and removed from the Green Belt.

SUGGESTED MODIFICATION

6.19 The Council is respectfully requested to extend the current employment allocation EE40 to include the land within the ownership of B&E Boys Ltd outlined in red at Figure 4.2 above and amend the Green Belt and Urban Boundaries boundary accordingly to create a new employment allocation. The extension of this existing employment site is

considered entirely appropriate in order to secure the long-term future of the site and ensure that Rawtenstall (and the Borough more widely) is able to retain important local employers.

6.20 We contend that this would properly reflect the provisions of Paragraph 83 of the Framework which sets out that amendments to Green Belt boundaries can only be made in exceptional circumstances and through the local plan process. In addition, the amendment to the Green Belt boundary in this instance would be fully in accordance with Paragraph 84 of the Framework which sets out that such amendments should only be made to facilitate sustainable development patterns.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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EE41

Reference **5194**

Brother Investments Ltd

Number of supporters:

Commenting on

Forest Mill

EE41

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. A previous consultation on the draft Local Plan (Regulation 18) was undertaken in summer 2017 in which Hourigan Connolly submitted representations in relation to the Forrest Mill site. This Representation is in relation to the Council's Publication Pre-Submission version of the Plan (Regulation 19). The consultation period ran from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses, as identified on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation.

BACKGROUND

1.4 Hourigan Connolly is instructed by Brother Investments Ltd. to review and comment on the emerging Local Plan in relation to the Forest Mill site in Water. The site is allocated for employment use under draft Policy EMP2 and given the Employment Allocation Reference EE41.

This Representation sets out why the Council should reallocate the land for housing.

SITE CONTEXT

1.5 The site lies on the western side of Burnley Road East in the area of Water, approximately 3 km north of Waterfoot and approximately 5 km north east of Rawtenstall.

1.6 The site is in single land ownership, being solely within the ownership of Brother Investments Ltd, and comprises a mixture of single and multi-storey mill buildings with limited vehicle access to the front and rear single storey section. The site is in an existing employment use however many of the units are vacant.

Figure 1.1 Location of subject site, Forest Mill, Burnley Road (circled in red).

Figure 1.2 Street view showing Forest Mill looking south along Burnley Road East

SCOPE

1.7 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

1.8 This document follows earlier Representations by Hourigan Connolly in relation to the Regulation 18 version of the Draft Local Plan. In addition to this earlier Representations were made by Mr Brian Boys as part of previous Local Plan, albeit that parts of the Local Plan were subsequently halted in favour of a complete new Local Plan.

OVERVIEW

1.9 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

1.10 The emerging Local Plan will be examined by an independent inspector whose role is to assess whether the plan is sound. We will demonstrate in this Representation that the Plan is not sound as draft Policy EMP2 has not been positively prepared, is not justified, is not effective and is not in accordance with national policy.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

13 December 2018

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2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Council's such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The National Planning Policy Framework (hereafter referred to as the Framework) (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018, however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.1 Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making. The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development.

These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- “an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.
- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.
- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions: “Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159), business (Paragraphs 160 – 161), infrastructure (Paragraph 162) and environment (Paragraphs 165 – 168).

HOUSING

2.21 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.22 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- “meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand”.

BUSINESS

2.23 Paragraph 160 of the Framework outlines the importance of local planning authorities having a clear understanding (from a robust evidence base) of business needs within the economic markets operating in and across their area.

2.24 Paragraph 161 of the Framework establishes the importance of understanding business needs (both quantitative and qualitative) and ensuring that sufficient suitable land (both existing and future) is available to meet needs.

INFRASTRUCTURE

2.25 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.26 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.27 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.28 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.29 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report, in particular paragraph 030 (reference ID: 3-030-20140306 confirms):

“Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.30 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306):

“WHAT CONSTITUTES A ‘DELIVERABLE SITE’ IN THE CONTEXT OF HOUSING POLICY?”

Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years. However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe. The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.”

2.31 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that: “HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?”

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the

relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.32 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.33 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which have been submitted or will be submitted before 31 March 2018.

2.34 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.35 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

2.36 Crucially the link between housing growth and economic activity must be recognised and therefore the current consultation is considered to be relevant to this Representation in relation to land at Forest Mill.

3. POLICIES PROPOSED IN THE DRAFT LOCAL PLAN

PROPOSALS MAP

3.1 The below image shows the site in the draft Proposals Map. The proposed employment allocation is annotated as EE41 (light purple hatching). The site is also within the Urban Boundary (red edge).

Figure 3.1 Extract from Draft Proposals Map

DRAFT POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

3.2 Draft Policy EMP2: Employment Site Allocations identifies all sites within the Borough which have been allocated for employment development. For each site allocated, site area, available area for development and proposed use class is set out within the allocations table.

3.3 The Forest Mill site is identified as Employment Allocation Reference EE41 as shown below. It is classed as an ‘existing employment’ site and is considered suitable for B1, B2 and B8 uses.

Figure 3.2 Extract from Site Allocations Table (Policy EMP2)

3.4 We support the aims of the Local Plan to identify key development sites which are central to the delivery of the overall strategy for new and existing employment assets and the Borough’s economy. Crucial to the economy is the delivery of appropriate uses in the right locations. Unfortunately this is not the case with Forrest Mill.

3.5 As an employment site, Forest Mill is poorly located, being over 8 km north east of the A56. The owners have been very fortunate over the years to have been able to obtain some very long standing tenants, although they have just recently lost their biggest tenant with regard to space occupied and rent achieved.

3.6 In order to attract any form of occupancy, the owner will have to offer substantial rent reductions. There are major works required to make Forrest Mill more attractive to businesses. The goods lift needs major refurbishment (costed at roughly £80k) to meet current regulations and the roofs all need completely re-roofing (costed at roughly £600k).

3.7 Due to the above, many of the units are vacant despite continual advertising with “To Let” signs being clearly visible on the front of the building (refer to figure 1.2).

3.8 Given the nature and location of the premises and the recent loss of tenants at Forest Mill, we do not consider that the proposed allocation for B1, B2 and B8 uses will

secure viable use and investment in the site going forward. As referred to in the Policy Explanation, much of the committed supply of employment sites is not considered to be fit for purpose, and is often in the wrong location with sites to the west of the Borough being more attractive due to better links to the A56 and M66. This is the case with the subject site.

EMPLOYMENT LAND REVIEW 2017

3.9 The Council's Employment Land Review 2017 scores the site poorly against the various employment criteria and gives an overall rating of Poor as shown below.

Figure 3.3 Extract from Employment Land Review 2017

3.10 This further demonstrates that the site is not suitable for employment purposes. Despite scoring poorly, the Employment Land Review recommended that the site is retained for employment which is not justified and is not a positive strategy for the Council.

3.11 To this end we consider that it would be more appropriate for the employment allocation to be removed and for the site to be allocated for residential development. The site comprises brownfield land in a sustainable location, within the urban area, and is therefore considered to be entirely appropriate to contribute towards the Borough's housing need over the plan period.

4. SOUNDNESS ASSESSMENT

INTRODUCTION

4.1 As mentioned in Chapter 2 above Paragraph 182 of the 2012 Framework deals with the examination of Local Plans. Local Planning Authorities are required to submit Plans for examination which they consider "sound" – namely that they are:

- "Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework".

4.2 In this section we consider the soundness of the Draft Local Plan Policies against the four key tests set out under Paragraph 182 of the 2012 Framework. It should be noted that for a Plan to be found sound it must comply with all of the four tests set out under Paragraph 182 of the Framework.

POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

POSITIVELY PREPARED

4.3 As demonstrated in Chapter 3 the site is not suitable for employment purposes. The site is only partly occupied and needs major works to bring it up to modern standards which is financially unviable. It is located poorly for an employment use. It is our view that Policy EMP2 has not been positively prepared by allocating the Forest Mill as an existing employment site under reference EE41. On this basis alone, the Council's Plan is unsound.

JUSTIFIED

4.4 Policy EMP2 fails to plan for the proper growth of Water as it allocates the site for employment use where there is no reasonable prospect of the site being used for employment in the long term. In addition to our Representations that the site is not suitable for continued employment use, the Council's own Employment Land Review in 2017 gives an overall site rating of Poor therefore the policy has not been justified.

EFFECTIVE

4.5 The preceding sections of this document have explained how Forest Mill is not suitable for employment use; it is therefore not effective.

CONSISTENT WITH NATIONAL POLICY

As we have set out that there is no reasonable prospect the site being used for employment use therefore Policy EMP2 is not consistent with Paragraph 22 of the Framework: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land

or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

6. CONCLUSIONS

6.1 The starting point for consideration of the Council’s Local Plan is the well- established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 The Framework is clear at Paragraph 22 that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Paragraph 160 outlines the importance of local planning authorities having a clear understanding of business needs within the economic markets operating in and across their area.

6.3 It has been highlighted in this Representation that the site at Forest Mill is no longer appealing to modern businesses and indeed there has been a notable loss of tenants in the building in recent months. The site is poorly located for an employment use and this is backed up by the Council’s Employment Land Review 2017 which concludes that the site is “Poor”.

6.4 As a result, and in order to future-proof the site, removal of the proposed employment allocation is recommended, along with consideration of the site for sustainable residential development. Land at Forest Mill has an opportunity to contribute to the delivery of housing over the Plan period on a site which comprises previously developed land within the Urban Boundary.

6.5 In conclusion, Local Plan Policy EMP2 should be modified to remove reference to the Forest Mill site to allow a more flexible approach for redevelopment of the site over the plan period. Further, the site should be considered for allocation under draft Policy HS2 for residential development.

Appendix 1 SHLAA 2018 Update Extract

PROPOSED MODIFICATION

4.6 The Council is respectfully requested to remove the current employment allocation EE.41 from Policy EMP2 and allocate the site for residential development under draft Policy HS2. Residential development in this location is considered appropriate in order to facilitate the viable regeneration of the site.

4.7 We contend that this would properly reflect Paragraph 22 of the Framework which seeks to avoid the long term protection of employment uses where there is no reasonable prospect of a site being used for that purpose. In such circumstances, more appropriate and viable uses, such as housing, should be acceptable.

Do you wish to participate to the Examination In Public? Did not answer Reasons

EE42

Reference **5192**

B&E Boys Ltd

Number of supporters:

Commenting on

Waterfoot Mills

EE42

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. A previous consultation on the draft Local Plan (Regulation 18) was undertaken in summer 2017 in which Hourigan Connolly submitted representations in relation to the Waterfoot Mills site. This Representation is in relation to the Council's Publication Pre-Submission version of the Plan (Regulation 19). The consultation period ran from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses, as identified on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation.

BACKGROUND

1.4 Hourigan Connolly is instructed to review and comment on the emerging Local Plan in relation to the Waterfoot Mills site, Waterfoot. Part of the site has a proposed allocation for B1, B2 and B8 employment uses in the draft Policy EMP2 under the Employment Allocation Reference EE42. However, a large part of the site has no allocation and is "white land" within the urban boundary.

1.5 We support the employment allocation EE42, however consider the unallocated white land within the Waterfoot Mills site should be allocated as housing. This would either be by way of an employment-led, mixed-use allocation under allocation EE42 or by including the land to the south as a separate housing allocation under Policy HS2.

1.6 The aerial image below shows the whole of the Waterfoot Mills complex. The purple hatching indicates roughly the area of land currently allocated as employment under reference EE42. The orange hatching indicates the additional land within the ownership of B&E Boys Ltd. which we suggest is allocated as housing.

Figure 1.1 Image showing the Waterfoot Mills site with the draft employment allocation and the suggested housing allocation.

SITE CONTEXT

1.7 The site comprises a collection of mill buildings and other commercial / industrial premises in single ownership which extend along the eastern side of Burnley Road East for circa 430m. The site has four distinct areas currently comprising of Dale Mill, Waterfoot Business Centre, Globe Mill and Albion Mill, but collectively the entire site is known as Waterfoot Mills.

1.8 There are a number of vehicular access points off Burnley Road East which provide access to the various businesses located across the site. The site is located in Waterfoot between Rawtenstall (which is 2.5 km away), and Bacup (which is 3 km). Whitewell Brook runs through the centre of the site running parallel to Burnley Road East.

1.9 Contained in Appendix 1 is a masterplan strategy document which illustrates the distinct mill areas and how these could be developed.

DALE MILL

1.10 Dale Mill is located in the far north of the Waterfoot Mills area. Dale Mill comprises a collection of mainly single storey buildings and maintains relatively high levels of occupancy due to good vehicular access.

WATERFOOT BUSINESS CENTRE

1.11 Moving southwards along Burnley Road East, the next section of the site is known as Waterfoot Business Centre. This section comprises a collection of buildings of varying heights and construction, with a mill building being located at the front of the site immediately adjacent to the main road. The buildings at the rear of the site are built into the banking of the brook and pose structural challenges for any redevelopment, but they have reasonable access for vehicles. Vehicular access is limited to the remainder of the site

for heavy goods vehicles due to the orientation of the existing buildings; this is a prohibitive factor to attracting potential commercial occupants.

1.12 The rear part of the Waterfoot Business Centre beyond Whitewell Brook is included in the employment allocation EE42 however a large part of the site adjacent to the road is excluded from the allocation and is “white land”.

1.13 This unallocated part of the Waterfoot Business Centre is considered suitable for residential redevelopment as indicated on the masterplan. We believe there is an opportunity to positively redevelop this previously developed site within the Urban Boundary for a more viable residential use.

GLOBE MILL

1.14 The site comprises another large old mill building. Again this building has a lot of vacant units. Furthermore the landowner has advised that one of the main tenants (Revival Books) will soon be vacating, which will have significant impact on the rent roll and occupational levels.

1.15 The upper floor is difficult to let for employment space due to the layout of the mill building and the fact that the goods lift can only provide access to limited space in the building. Due to the age of the mill building, the floors of the mill are constructed mainly in timber and present a fire risk.

1.16 There are issues with access for vehicles and goods, and problems with the fabric of the construction of the building. The resultant position is that this element of the Waterfoot Mills site is unattractive to new tenants and is financially unviable for retention in employment use either as existing or as a redevelopment employment proposal.

1.17 Globe Mill is not covered by the employment allocation EE42 and is considered more suitable for residential redevelopment.

ALBION MILL

1.18 Albion Mill is sandwiched between the main road (Burnley Road East), the adjoining Wales Road, and an area of existing woodland. Albion Mill recently had its road frontage demolished as a consequence of structural obsolescence, there are no tenants in the building. Following the demolition of the mill this element of the site is more suited to a residential use which would complement the existing residential properties which surround the site. The site should not be retained for employment purposes for the duration of the Plan period.

1.19 Again, Albion Mill is unallocated and is considered suitable for residential redevelopment as indicated on the masterplan.

Figure 1.2 Street view looking towards Globe Mill and Albion Mill, part of the site we feel should be allocated for housing (southern part of site).

Figure 1.3 Street view looking towards Dale Mill which is allocated as employment (northern part of site).

SCOPE

1.20 In preparing these submissions we have reviewed the documents mentioned above as well as other documents forming the evidence base that underpins the emerging Local Plan.

1.21 This document follows previous Representations by Hourigan Connolly in relation to the Regulation 18 version of the Draft Local Plan. In addition to this earlier Representations were made by Mr Brian Boys as part of previous Local Plan, albeit that parts of the Local Plan were subsequently halted in favour of a complete new Local Plan.

OVERVIEW

1.22 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council’s Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Council's such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The National Planning Policy Framework (hereafter referred to as the Framework) (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018, however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.¹ Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making. The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development. These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- "an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy".

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.
- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.

- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.
- 2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.
- 2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:
- 2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.
- 2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph 10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.

- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.

- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions: “Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on housing (Paragraph 159), business (Paragraphs 160 – 161), infrastructure (Paragraph 162) and environment (Paragraphs 165 – 168).

HOUSING

2.21 Paragraph 159 outlines the importance of preparing a Strategic Housing Market Assessment (SHMA) to assess full housing needs and a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

2.22 Of particular importance is the requirement for the SHMA to identify the scale and mix of housing and the range of tenures that the local population is likely to need over the Plan period which:

- “meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand”.

BUSINESS

2.23 Paragraph 160 of the Framework outlines the importance of local planning authorities having a clear understanding (from a robust evidence base) of business needs within the economic markets operating in and across their area.

2.24 Paragraph 161 of the Framework establishes the importance of understanding business needs (both quantitative and qualitative) and ensuring that sufficient suitable land (both existing and future) is available to meet needs.

INFRASTRUCTURE

2.25 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.26 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.27 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.28 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

2.29 The Housing and Economic Land Availability Assessment section of the NPPG is worthy of specific mention in relation to this Report, in particular paragraph 030 (reference ID: 3-030-20140306 confirms):

“Housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”

2.30 The NPPG deals with deliverable sites as follows at paragraph 031 (Reference ID 3-031-20140306):

“WHAT CONSTITUTES A ‘DELIVERABLE SITE’ IN THE CONTEXT OF HOUSING POLICY?

Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be

considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.”

2.31 In regards to how often a Local Plan should be reviewed, the NPPG states at paragraph 008 of the section titled ‘Local Plans’ (Reference ID 12-008-20140306) that: “HOW OFTEN SHOULD A LOCAL PLAN BE REVIEWED?”

To be effective plans need to be kept up-to-date. Policies will age at different rates depending on local circumstances, and the local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”

GOVERNMENT CONSULTATION ON STANDARDISED METHODOLOGY FOR HOUSING NEED (SEPTEMBER 2017)

2.32 On 14 September 2017 the Government announced a consultation on a Standardised Methodology for Assessing Local Housing Need, the basis of which was included in the White Paper (February 2017) and is aimed at helping local authorities plan for the right homes in the right places.

2.33 As the consultation document sets out, the root cause of the dysfunctional housing market in the UK is that for too long we have not built enough homes. The Government is aiming to deliver 1.5 million new homes between 2015-2022 and is attempting to create a system which is clear and transparent for local authorities. The new methodology will apply to all future plans, with the exception of those which have been submitted or will be submitted before 31 March 2018.

2.34 The standard methodology is principally aimed at tackling problems of affordability as the proposed formula simply uplifts the household projections figure, based on market signals.

2.35 For Rossendale the proposed standard methodology has little impact on the annual housing requirement (which, it is suggested should be 212 rather than the current 265 dwellings per annum). However, it should be noted that the proposed standard methodology is currently on consultation and may therefore be subject to changes in due course. It is also worth noting the heavy speculation that the proposed methodology focuses on growth in the south east to the detriment of other parts of the UK, in particular the north west.

2.36 Crucially the link between housing growth and economic activity must be recognised, along with the importance of directing such uses to viable locations.

3. POLICIES PROPOSED IN THE DRAFT LOCAL PLAN

PROPOSALS MAP

3.1 The below image shows the site in the draft Proposals Map. The proposed employment allocation is annotated as EE42 (light purple hatching). Note that a large southern part of the Waterfoot Mills complex is not allocated as is therefore “white land”.

Figure 3.1 Extract from Draft Proposals Map

3.2 As well as being allocated for employment, the site is also within the Urban Boundary (red edge).

POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

3.3 Draft Policy EMP2: Employment Site Allocations identifies all sites within the Borough which have been allocated for employment development. For each site allocated, site area, available area for development and proposed use class is set out.

3.4 Part of the Waterfoot Mills site is identified as Employment Allocation Reference EE42 as shown below. It is classed as an ‘existing employment’ site and is considered suitable for B1, B2 and B8 uses.

3.5 We support the aims of the Local Plan to identify key development sites which are central to the delivery of the overall strategy for new and existing employment assets and the Borough’s

economy. We support the employment allocation EE42 for those parts of the Waterfoot Mills site that are included in the allocation. However, to this end, we consider that the allocation could be widened to include the land to the south and form an overall ‘Mixed-Use Allocation’ under the provisions of draft Policy EMP2.

3.6 As an alternative, we would support the employment allocation as it stands providing the land to the south is included as a separate housing allocation under Policy HS2.

4. SOUNDNESS ASSESSMENT

INTRODUCTION

4.1 As mentioned in Chapter 2 above Paragraph 182 of the 2012 Framework deals with the examination of Local Plans. Local Planning Authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

4.2 In this section we consider the soundness of the Draft Local Plan Policies against the four key tests set out under Paragraph 182 of the 2012 Framework. It should be noted that for a Plan to be found sound it must comply with all of the four tests set out under Paragraph 182 of the Framework.

POLICY EMP2: EMPLOYMENT SITE ALLOCATIONS

POSITIVELY PREPARED

4.3 Whilst we support the principle of an employment allocation, for the reasons set out in Chapter 3, the wider potential of the mills to meet objectively assessed need for both housing and employment should not be ignored. The Plan strategy in this regard is flawed and cannot be considered to be positively prepared.

JUSTIFIED

4.4 For these reasons, the Council’s strategy for the Waterfoot Mills is not the most appropriate available, it will fail to deliver sustainable development and consequently it is unsound.

EFFECTIVE

4.5 The proposed employment allocation could sterilise otherwise sustainably, previously developed land, flying on the face of national policy and this could lead to the failed delivery of the Plan’s aspirations. In this regard, the Plan is not effective.

CONSISTENT WITH NATIONAL POLICY

4.6 In order to be consistent with National Policy, the Waterfoot Mills site should be modified as set out in paragraphs 3.7 and 3.8 above to enable the delivery of sustainable development.

CONCLUSIONS

5.8 It has already been described how each of the distinct areas which form the Waterfoot Mills site are only partly occupied by commercial and industrial operators and employers. The site does not operate on a financially viable basis, but the land owner is committed to retaining existing tenants where possible and attracting new employers through the creation of additional floorspace. However, there are deficiencies with many of the existing buildings and the associated environs which prohibit the site being fully occupied for solely employment use.

5.9 This Representation has set out how there is an exciting opportunity for the site to make a contribution to the continued retention of existing employment floorspace, the creation of new employment floorspace, and the delivery of new housing over the Plan period and beyond.

5.10 This subject site comprises previously developed land, within the Urban Boundary, in a sustainable location and therefore would accord with the principles of sustainable development as set out in the Framework.

6. CONCLUSIONS

6.1 The starting point for consideration of the Council’s Local Plan is the well- established principle embodied in Paragraph 158 of the Framework that Development Plans must

be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

6.2 The Framework is clear at Paragraph 22 that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Paragraph 160 outlines the importance of local planning authorities having a clear understanding of business needs within the economic markets operating in and across their area.

6.3 It has been shown in this Representation that the site at Waterfoot Mills on Burnley Road East presents an exciting opportunity to make a sustainable contribution to the local economy through employment and housing redevelopment. Part of the site is currently proposed to be designated as an Existing Employment Area, however it has been demonstrated that further land to the south should be allocated to allow both employment and housing to come forward. The site has an opportunity to contribute to the delivery of housing over the Plan period on a site which comprises previously developed land within the Urban Boundary.

Appendix 1

Please see appendix.

PROPOSED MODIFICATION

OPTION 1 – A NEW MIXED USE ALLOCATION

3.7 The Council is respectfully requested to modify the current employment allocation EE42 to cover the whole Waterfoot Mills complex as shown on the masterplan to allow for a mixed-use development including both employment and residential development. This should direct employment uses to the north and housing to the south of the overall site. The Council is invited to include this modification in the Local Plan document by the allocation of a mixed-use allocation for the site under draft Policy EMP2.

OPTION 2 – RETAIN ALLOCATION EE42 AND PROPOSE A NEW HOUSING ALLOCATION FOR LAND TO THE SOUTH

3.8 As an alternative to the above, the Council could keep the employment allocation as shown on the draft Policy Map but allocate the additional land to the south as housing under Policy HS2.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

EE44

Reference **5322**

Linda & Steve Atkin

Number of supporters:

Commenting on

EMP2

EE44

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

5th October 2018

Dear sirs,

Regarding inclusion of the above site in the local plan for housing, we were initially led to believe that this was the case, however after viewing the plan we found this was not so.

We took advice from your officer in October 2017, sent a email and a site plan outlining the site boundary (see separate email) and now find that no action has been taken on your part because apparently the information we supplied was not picked up?

According to the plan we are now have the opportunity to comment.

We have lived on the premises for the past 19 years.

There is no one employed to work on the premises.

The premises have been linked to Hugh Business park on the plan (EE44) where in effect it never has been , having its own access from Cowpe Road and boundary.

The area around the premises are mostly residential and an adjoining premises has been included for housing,

surely the environment would be better if the whole area was made

available for housing.

The premises are within easy reach of local amenities, health centre, transport links and schools.

The premises are brownfield therefore would have little environmental impact.

We look forward to hearing from you.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

EMP2

Reference **42 Miss Janet Waterworth** - Number of supporters:

Commenting on 3.2, 4.2, 5.3.2 Rossendale Employment Sites Study EMP2

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Access to the proposed extension to Carrs Industrial Estate via land to east of terraced property on Hud Hey Road1. Access to the site from the B6236 into the proposed estate is currently very narrow for the type of vehicles likely to be travelling to an industrial estate. Widening the access would be constrained by the close proximity to the A56 overpass.2. Access from the site onto the B6236 would have a restricted view to the left because of parked vehicles and the way the road bends away up the hill.3. After negotiating the above, vehicles turning right would then have to negotiate the sharp left hand turn into Brook Street upto the traffic lights which also present a narrow turning opportunity.4. Vehicles approaching via the traffic lights on Blackburn Road into Brook St would equally have difficulty manoeuvring the narrow street where there are also usually parked cars.5. The above points support the argument that there are serious concerns about road safety if this was to be approved and there was a resulting change in type and volume of traffic. Many parents walk children to Stonefold School along this road.6. The very fact that Hud Hey Road is a B road suggests its unsuitability for heavy volume of lorries, HGVs. It has suffered from the restrictions placed on Grane Road, Haslingden as many more vehicles use it as a short cut instead of staying on the A56.

In the Options Review paragraph 4.2 it states that access from the A56 was "discounted due to lack of support from Highways England". There is already access both from the north and the south into the existing Carrs Industrial Estate and if the advantage of extending the estate north is because of its location then surely prospective users would want a direct access to and from the A56 not some route which takes their drivers along B roads and narrow streets. I did not find this form user friendly to complete and I know I have not couched my views in the manner you describe but I am not a planner, politician or familiar with type of jargon used but I am a resident who will be greatly affected by these changes should they be adopted.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5018 Brian Michael Kathy Fishwick Rossendale Civic Trust** Number of supporters:

Commenting on EMP2 EMP2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT provisionally support EMP2, subject to masterplan for all new sites listed to ensure sensitive relationship to Green Belt and Gateway locations.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5060 Mr Graham Neville Royds**

Number of supporters:

Commenting on EMP2 EMP2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Representation received 27/09/18:

Dear Sirs,

Although the number of houses to be built in Whitworth appears to have been reduced, the objections in my response to the original consultation still apply. We need employment and facilities before accommodation for prospective inhabitants. Already, too much commuting is necessary, causing environmental pollution, and traffic delays on Whitworth's only main road.

The more houses that are built, the more is demanded of existing services. For example, extra water pressure to supply additional homes increases the pressure on existing pipes, many of which are still lead and liable to burst (a leak occurred on a common supply pipe in my own street).

The sites to which my comments on housing relate are H65, H66, H67, H68 and H69.

The site marked EE36 (Bridge Mills, Plunge Road) on the map of Whitworth does not appear to exist in that township: possibly that address in Edenfield is intended.

Representation received 01/10/18:

I should like to add the following to my comments of 27th. Sept.:

The statement on page 53 of the draft local plan "Pre-Submission Publication Version: Regulation 19 Consultation", Aug. 2018, that "there is a shortfall of employment land" in so far at least as it relates to Whitworth is outrageous, since previous such land has been used or designated for unjustifiable housing. Cases in point are Facit and Orama Mills (both now used for housing) and Cowm Water Treatment Works and Spring Mill (both now designated), planning permission already having been applied for in relation to the last (and for more houses than in the consultation document).

It is likely that the irrational policy of providing homes without long-term local employment and appropriate amenities is driven by misguided haste on the part of Government, and needs to be resisted.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5148** **Edenfield Community Neighbourhood Forum** Number of supporters: **1213**

Commenting on EMP2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy EMP2: Employment Site Allocations

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy

72. Strategic Policy EMP2 provides a list of existing employment and new employment and mixeduse sites within the Plan Period (2019 – 2034) to meet the target of 27 hectares of employment land. We consider that the Local Plan ‘oversupplies’ employment land protecting employment sites that could be released for housing.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5154 Mr Philip Carter Environment Agency** Number of supporters:

Commenting on EMP2 EMP2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Our previous comments on the Regulation 18 consultation stated that several of the proposed residential allocations are subject to constraints that may impact on compliance with the National Planning Policy Framework (NPPF).

Issue The submission version of the Local Plan has partly addressed our previous recommendations. However, in reviewing the amendments and trying to cross reference site allocations with SFRA recommendations, it appears that several sites with potential high flood risk issues (i.e. sites affected by Flood Zone 3) have not been considered in the SFRA. While the flood risk vulnerability of land for employment sites is lower, the presence of Flood Zone 3 may still mean that there are flood risk issues that need to be addressed on the following new employment sites:-

NE1 Mayfield Chicks Ewood Bridge

New Hall Hey Rawtenstal

Impact The LPA cannot demonstrate that these sites satisfy the sequential test and that sufficient evidence is available to allow the LPA to be satisfied they could satisfy the exception test.

Solution Provide sufficient evidence that these sites comply with the NPPF and that they can be developed safely. This evidence could be in the form of a supplement to the SFRA where necessary.

Issue While Main River watercourses are defined in the glossary, the presence of a Main River and potential impact on site layout are not acknowledged in Policy HS2 or anywhere else in the plan.

Impact Proposal layouts will be affected by the presence of Main River watercourses and the density of development may be lower than expected due to the need to allow access to these rivers for maintenance and repair purposes.

Solution In addition to identifying what a Main River is, sufficient wording should be added to a relevant policy or supporting text to ensure the limitations of developing next to a Main River are understood

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5174	Winfields Holdings Ltd and Winfields Ltd		Number of supporters:
Commenting on	Poicy EMP2: Employment Site Allocations - EE12	EMP2		
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate? Yes
<p>The Council recognise that some committed employment land supply sites are of poor quality and do not meet the needs of modern business. The land at Hud Hey is one such site, much of which has been long term vacant despite having being allocated for employment purposes since before 1995. A significant proportion of the site was historically cleared in order to make it more attractive to the market, but no interest has arisen for employment purposes despite the allocation. Furthermore, the County Council (as Highways Authority) has indicated that there are issues with respect to access and no prospect of improving links onto the arterial route of the A56. As adjoining roads are constrained, principally serving adjoining residential areas, they have limited capacity to accommodate significant numbers of larger vehicles. This in turn constrains the prospect of the site being used for its allocated purpose, and the Government makes it clear at Paragraph 120 of the NPPF that planning policies should avoid the long term protection of sites allocated for specific use where there is no reasonable prospect of them being used for that purpose. It is not suggested that employment uses are necessarily excluded in their entirety but rather that the site would be more suitably identified for mixed use purposes, particularly as 30% of the borough’s identified housing requirement is to be accommodated on brownfield sites. In this respect, the site is sustainably located close to a range of opportunities and services, as well as being well served by public transport. The site also already incorporates non-employment uses such as the lawful retail use of the Britannia Mill and adjoining land (as confirmed by the Certificate of Lawfulness 2008/753), and residential development intrudes into the northern boundary of part of the site, as well as extending along its eastern boundary. As no new access will be allowed onto the A56, and use of the surrounding local road network is restricted, comparable uses that could be readily accommodated should be allowed (particularly given the residential layouts which adjoins much of the site). The Council is aware of Winfield’s intention of transferring its office and warehousing activities to its other local site, a short distance to the north in Acre, which would leave this site vacant in its entirety (the majority having already been cleared). The recent listed status conferred upon Britannia Mill also means that uses which preserve this asset whilst protecting its setting need to be supported by policy. Whilst this could include employment, it is most likely to comprise of mix of uses including residential or the extant retail consent. Retail use could contribute to employment levels within the borough, whilst the consolidation and expansion of the second Winfield site a short distance to the north (in Acre) will retain employment within the local area. A flexible approach to the site is, however, required to address the competing requirements whilst making the most of the site itself. Turning to designation, the site should (at the very least) be identified as mixed use, recognising the existing mixed use in order to make a meaningful contribution to the different aspirations of the Local Plan. Given the Government advice in the NPPF, about avoiding long term protection of sites such as this on the basis that there is no reasonable prospect of them being used for that purpose, the designation should be revised.</p> <p>Land identified as Site EE12 by Policy EM2 should be included within the Mixed Use category of Table 2: Employment Site Allocations. The commentary to the policy should refer to making the best use of such sites, and not necessarily for employment purposes but also other policy objectives of the Local Plan.</p>				
Do you wish to participate to the Examination In Public?	No	Reasons		

M3

Reference **5192**

B&E Boys Ltd

Number of supporters:

Commenting on

Isle of Man Mill, Water

M3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

ISLE OF MAN MILL, WATER

Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. This consultation is on the Pre-Submission Version of the Local Plan (Regulation 19).

Hourigan Connolly is instructed by B and E Boys Limited to submit and provide comment on the above site in support of its future development for mixed uses. We have previously submitted representations in response to the consultation relating to the Regulation 18 version of the Draft Local Plan, as well as consultations on the previous Local Plan Part 2 and the 'Call for Sites' exercise.

Submissions

We note that within the draft Local Plan, Isle of Man Mill in Water has a proposed allocation for mixed uses under draft Policy EMP2 (allocation reference M3). Our client supports the proposed allocation of this site for mixed uses in principle. However, due to vacancies, lack of uptake and cost of upkeep, works on the demolition in part of the Mill are currently on going with the 3-storey road frontage part of the mill having been demolished and the chimney will follow in the next few weeks. The rear of the property and a small two-story section of the mill frontage is to remain for the time being to house an existing tenant, however, should they also vacate, it will be very difficult to find a new tenant. The poor location of the site from an employment perspective is accepted in the Council's ELR and ultimately the whole of this site may be better served in residential use.

With that in mind we ask that some flexibility is inserted into the existing policy to allow for the total redevelopment of the allocation for residential use subject to the provision of appropriate marketing evidence at the planning application stage.

We reserve the right to provide further supporting statements and evidence as the Local Plan progresses towards Examination.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

M4

Reference **5176 Mr**

Warren

Hilton

Highways England

Number of supporters:

Commenting on

M4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

• Futures Park (EMP 18) – Access to the Futures Park site would be provided by utilising the existing priority junction with the A681 Newchurch Road and upgrading it to a signal controlled junction. Given the location of the site, no material impact is expected on the SRN.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5197 Mr Marcus Hudson Lancashire County Council** Number of supporters:

Commenting on M4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

EMP 18 Futures Park. The signalised site access proposals will improve on the existing priority giveway arrangement which results in a difficult right turn manoeuvre from Futures Park. However this difficult manoeuver is due to the volume of traffic that traverses the A681 Rawtenstall – Bacup corridor, which as highlighted above, suffers from existing congestion issues likely to be exacerbated should all local plan provisions be built out. The employment potential would need to be considered carefully in relation to catchment areas for likely employees.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

NE1

Reference **5176 Mr Warren Hilton Highways England** Number of supporters:

Commenting on NE1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

• Ewood Bridge (EMP 10) – It is proposed to provide access via an existing access on Blackburn Road, which would be upgraded to a signal-controlled junction with bus priority measures. The site is located close to the A56 corridor, with traffic joining the SRN at the roundabout junction between A56/A680/B6527.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5197 Mr Marcus Hudson Lancashire County Council** Number of supporters:

Commenting on NE1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

EMP10/02 The access onto the existing highway network seem achievable. The route to the strategic network does pass through pockets of residential development with on street parking however these are limited in number and unlikely be a significant concern. Impacts on the A56 Bentgate roundabout would need to be factored in to the modelling proposals if this has not already been undertaken.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

NE2

Reference **74 Mr Alwyn Davies** - Number of supporters:

Commenting on The Whole Plan - NE2

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Objection to the development of Land on Area: EMP 2.15 (Land North of Hud Hey) Comments relating to the soundness of the development of the plan.

Within the local plan the council has proposed an expansion of Hud Hey Industrial Estate utilising existing Green Belt Land. If this is approved employment land consisting of general, industrial, storage and distribution buildings will encapsulate my home (39 Hud Hey Road). I provided a large proportion of this information in my first consultation response however I believe that it is relevant to my concerns regarding the soundness of the development of this plan.

I would like to outline a case for why the Land on Area EMP 2.15 should be removed from the Local Plan developed in July 2017 and will provide the rationale using evidence from the councils own Local Plan and independent evaluations/reviews.

The Local Plan suggests (Page 52) that proposals will be expected to take into account of the character and appearance of the local area including but not exhaustively:

- Being sympathetic to surrounding land uses and occupiers and avoiding demonstrable harm to the amenities of the local area.
- Ensuing that the amenities of the occupiers of the new development will not be adversely effected by neighbouring uses and vice versa.
- There is no adverse impact to the natural environment, biodiversity and green infrastructure unless suitable mitigation measures are proposed.

As the land is Green Belt land which was not identified for release in the Councils Green Belt Review 2016 which was undertaken independently by LUC and the land is currently being used for grazing of Horses as part of a Riding School I previously requested that the that the council consider removing Land EMP 2.15 for the use of Employment Land from their draft Local Plan. The Green Belt Review 2016 states: “The relatively poor performance of the land against the Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt, we recommend that outline policy guidance or masterplans are prepared as part of the local business process. These would indicate development areas and new defensible Green Belt boundaries (existing or new features). Such approach together with specific policies for the development of the land, would help to engender public confidence and support, as well as mitigate the harm to the remaining Green Belt land.” The local plan fails to address this requirement and justify why EMP 2.15 has been included in the local plan, this is in contradiction to the advice and guidance outlined in the Green Belt review 2016. The report of the planning manager titled Formal Local Plan consultation and updated Statement of Community Involvement and dates 11th July 2018 suggests that even though the inclusion of this land is contrary to the findings of LUC Study the acute shortage, unsuitable employment land close to the A56 where there is greatest demand constitutes exceptional circumstances. I am concerned that this report does not provide transparency in relation to the bigger picture which is, that there is 80% unused industrial space already available on Hud Hey Road the vacancies suggesting that there is not in fact high demand for ‘employment land’ in this area. The report also references that there will be a separate topic paper produced that will set out the ‘Exceptional Circumstances’ of this report, to the best of my knowledge, this report has not been written or published in time for this stage of the consultation. It should also be noted that the report published by the Highways Capacity Study 2018 states: “Junction 6 provides an interface between the SRN and the local highway network. Upgrades to the junction were recently provided by Highways England, to the benefit of the A56 and A680. The analysis presented in Chapter 4 demonstrated that a further upgrade scheme might be necessary to accommodate full Local Plan growth by 2034. The scheme has been derived to ensure it would not prejudice the delivery of a larger scheme Highways England may wish to deliver in the future as a part of a future expressway initiative.” This suggests that the council’s current plan and that the future plans of the Highways Agency do not align and may cause significant issues in the future. I would also like to highlight that within the report it also suggests that £1,000,000 of upgrade to the road would be required to accommodate the full elements of the council’s plan, I presume would be funded by the residents of Rossendale who are tax payers. As this is not my area of expertise I am unable to determine if the business case for one million pounds of tax payers money to create some unneeded employment space in this area stacks up but have the opinion that it does not.

In 2010 the Report to Rossendale Council on the former Draft Local Plan the Planning Inspectorate disagreed with the councils plans to remove land from the Green Belt. The inspector stated: “ The detailed boundaries of the Green Belt in the area were established in 1982 and, except for minor changes made in 1995, have remained fixed since that time. I have seen no evidence to persuade me that a substantial change to Green Belt boundaries would be necessary to meet the development objectives of the CS. ... I do not

consider that the council's approach to identifying locations for development by weighting its choices to avoid substantial incursions into the Green belt could be argued to be inherently flawed." It would appear that the council have also failed to respect the opinion of the former inspector in relation to the use of this land. The Habitats Regulation Assessment of the Rossendale Local Plan states that: "If no suitable alternative exist, plan makers must demonstrate under the conditions of Regulations 103 of the Habitats Regulations, that there are imperative reasons of overriding public interest (IROPI) to continue with the proposal. The Authority Monitoring Report (AMR) produced by the Forward Planning team in June 2017 states in relation to AVP6 Haslingden and Rising Bridge that New Housing and employment development will be encouraged within the urban boundary and should be primarily on previously developed land. This is in complete contradiction to the identification to Land EMP2.15 in the draft local plan produced only a month later. The Hud Hey industrial estate current has several vacant units, therefore it would suggest that demand in this area is not favourable to businesses. It is my view that the council should remove land EMP 2.15 and instead develop a proposal to increase utilisation of already developed space a move which I am sure would generate greater support from the residents of Rossendale. I am not opposed to generating new employment and business opportunities to the area, in fact, I welcome it, I would like to be clear that what I oppose is the council's plans for the destruction of land which is not needed or required. The Sustainability Proposal of the Rossendale Local Plan produced by Lepus in May 2017 confirms that the land north of Hud Hey is located within the Green Belt and that none of these sites were highlighted for release in the Green Belt Review 2016. It states that development in the Hud Hey area has the potential to reduce population of European Protected Species associated with woodland such as bats. It states that where habitat corridors exist including Hud Hey that development would reduce these corridors, restricting movement of wildlife in these habitats. I do not have much knowledge of animal rights issues however I wonder if the Rossendale Council has consulted with groups that seek to protect species such as these to fully understand the impact of their proposals on wildlife. I presume not as this may have generated greater resistance. The report highlights that development on land in Hud Hey will impact on woodland and that loss of this woodland and the Green Belt may have a negative impact on biodiversity in this area. The Land EMP 2.14 is also located within the Rossendale Safeguarding Mineral Area. Development of sites which include GI such as woodland, grassland and allotments would result of loss of and damage to these features. Developments that fragment existing ecological networks performs negatively against Climate Change Adaption (SA objective 7). The report also outlines the increased flood risk and increase of waste production will impact negatively within the area the council have not included any information in the consultation process or within the local plan of how this will be mitigated should the plan go ahead and what the cost of safeguarding this area from flooding would be (and who would fund it). The Sustainability appraisal does not support the use of land EMP 2.15 in Hud Hey therefore it would suggest that it will be more difficult for the council to justify how using this land should be overridden in the interest of the public. It is not documented within the local plan why the council has chosen to ignore the independent reports both in relation to the local plan and the green belt review. I am disappointed that the council did not remove the land from their plan. Admittedly I am not a planning officer nor have any experience in construction however I fail to see how the land north of hud hey which is a large field could be used for the purpose of employment land – if I were able to add a photograph of this land you would see that the vast majority of the field is a large incline towards the caravan park area therefore I am not sure it would even be possible to 'flatten' this area to build units and if access were required from hud hey there would not be much available land for the employment space. It access were to be gained from the rising bridge round about – the council would have to produce a road through the caravan park. In summary despite looking at the inclusion of this land from every angle I still fail to see how it can be allocated for employment sites leading me to greater question the soundness of the report. I would also like to highlight to the inspector that Hud Hey already has an industrial estate which is currently on 20% utilised with 80% of the units vacant. I therefore don't see how it is in the public interest to add further industrial units I don't however have any objection for this existing land to be developed. I hope that the information that I have provided explains why I do not believe that the plan is sound and I have tried to be as succinct as possible however as this is not my area of expertise I would welcome the opportunity to explain the content of this response or to provide any additional information to the inspector in the public element of this process. Thank you for your time and consideration.

Additional Comments on Rossendale's Draft Plan 2017 – Disputing the soundness of the preparation of this plan.

The document does not have an introduction that explains to the reader what this document is and what its purpose is. It fails to demonstrate that Rossendale Council has a vision of what it hopes to achieve from its local plan other than a haphazard and unjustified approach to allocating land for development across the borough. The council fails to outline a case for change as to why these changes are required or an options appraisal to enable people to have a voice in what they feel is required in terms of housing and employment needs which is disrespectful to the residents of Rossendale.

Page 4 States: "Planning applications that accord with the policies in this Local Plan will be approved without delay, unless material considerations indicate otherwise." It is not clear what is meant by this statement – does this mean that decisions regarding building on approved land within the local plan will go ahead without consultation? It is concerning those statements that have no context have been included in this draft plan.

Page 5 Policy SD2: Urban Boundary and Green Belt – this section does not stipulate what the council's intentions are in relation to the protection of Green Belt land and what constitutes exceptional circumstances to build on Green Belt Land.

The document states: "All new development in the Borough, will take place within the Urban Boundaries, defined on the policies map, except where development specifically needs to be located within a countryside setting which enhances the rural character of the area.

The council does not stipulate what exceptional circumstances are or how a warehouse in a country setting will enhance the rural character of the area.

Chapter 2: Employment Growth and Employment Page 30.

Employment Levels have declined in Rossendale since 1997. This document fails to provide a context or evidence of declining employment levels in Rossendale. Information should be supplied to demonstrate the exceptional circumstances that have led to the need to develop 27 hectares of employment land.

There are a fundamental number of unanswered questions in relation to this for example:

- What is the current level of employment in Rossendale?
- Reason/rationale for current levels of unemployment in Rossendale? i.e. age, disability lack of jobs, which types of jobs?
- Wage levels for Residents of Rossendale are generally lower than average, is building more industrial, stratagem and distribution centres going to improve this and how?
- Outcommuting to neighbouring authorities to work is a major issue for the council. Has the council considered that many careers opportunities cannot be achieved within the borough i.e. working in a hospital, working in aviation, working within a court, working in theatre or entertainment, working for large retail stores that are only provided in large cities i.e. John Lewis, area sales manager positions etc.
- How many current vacancies are there to work in factories, offices, industrial storage in Rossendale? Are businesses in Rossendale able to recruit to all of their vacancies do we need more?
- How does this plan fit into strategic employment initiatives such as, Apprentice, Fit for Work, Work and Disables people, Lancashire Skills and Employment Strategy?

I believe the council has not sought the views of the people of Rossendale in asking what they would like to achieve from employment opportunities and have made assumptions to justify those outlined in the local plan. I would argue that Rossendale Council does not have the needs of the population of Rossendale at heart through the development of these plans.

Some statistics that may contradict the council's assumption that building warehouses is the answer to employment and encouraging individuals to work in warehouses in Rossendale are: opportunities and have made assumptions to justify those outlined in the local plan. I would argue that Rossendale Council does not have the needs of the population of Rossendale at heart through the development of these plans.

Some statistics that may contradict the council's assumption that building warehouses is the answer to employment and encouraging individuals to work in warehouses in Rossendale are:

- Lancashire County Councils (LCC) Working age population summary report identifies that only 61.8% of the population is of a working age.
- East Lancashire has seen the proportion of the population which is economically active fall in recent years and almost twice as quickly as in Lancashire as a whole.

- Employment rates amongst women In East Lancashire are significantly lower than the county and nationally in part as a result of ethnic mix within the population.
- Just less than 30% of the working population is economically inactive which reduces the pool of labour which local businesses can draw upon. Meaning that recruitment is already difficult without adding further businesses.
- The shift towards residents having higher skills is increasing at a significant rate. Are industrial buildings going to meet the demands for our residents?
- The Lancashire Joint Strategic Needs Assessment demonstrates that we have an aging population; our Children are thriving in school and this is continuing to improve and we will see an increase in 0-15 year olds over the coming years. This contradicts the council's assumption that we need to develop more employment opportunity based on demand. The council has come to the conclusion through one independent review that 27ha of land is needed for employment. I would like to pose the question to Rossendale Council – how are you assured based on 1 independent review that the scale of the proposed change and the impact that that this will have on resident of Rossendale that this is justified? Rossendale Council have failed to answer this within the consultation process.

The Local Plan fails to accurately and clearly outline what vacant space is currently available for the use of general, industrial or storage and distribution (classes B1, B2 and B8) across the borough. Thus the council cannot demonstrate the exceptional circumstances required to build on additional land including that on Greenbelt. The information within the Local Plan has clearly not been well thought out.

On Page 31 the local plan references the Green Belt review which suggests that the recommendation is that building should take place on Green Belt land. This is significantly misleading as much of the land allocated within the local plan was not identified for release within the Green Belt review 2016.

On Page 31 Policy EMP5: Employment Development in nonallocated employment areas it states that “New Small scale employment development will be permitted in areas where employment is not the principle land use provided that there would be no detriment to the amenity of the area in terms of scale character, noise, nuisance, disturbance, environment and car parking. I would ask the council to stipulate the processes for coming to decisions. It could also be argues that this will mean that no land development will take place which I am sure will make everyone (who is not the local planning team) happy.

I would conclude that the Chapter 2 Employment Growth and Employment has not been carefully thought out or considered by Rossendale Council. The lack of vision and case for change to justify the expansion for employment land is lacking and contradictory to all demographic information about the population of Lancashire and Rossendale. I would request that the council investigate how the Local Planning Team have been able to launch a draft consultation on a document that that been clearly not been thought out, lacks basic information and explanation and provides inaccurate, false and misleading information which opens the council up to significant (and perhaps legal) challenge.

Removal of Land EMP 2.15 as per the LUC report, highways agency report, feedback provided from residents who all agree that this land should not have been identified for 'employment'. I have provided further information above explaining my rationale in greater detail. I believe that the consultation process should be started again with residents of Rossendale contacted directly regarding the local plan. I believe that information should be provided in a way that is understandable and does not exclude groups of people, for example those who's first language is not English, those who have poor vision etc. I believe that the plan should then the promoted and publicised as per the councils own guidance in the statement of community involvement. I believe that the council should accept that the current plan was a done deal as per the report dated 11th July 2018 and provide residents of Rossendale with a fair change to influence changes in Rossendale. I have provided further information in the box above.

Do you wish to participate to the Examination In Public? Yes

Reasons I hope that the information that I have provided explains why I do not believe that the plan is sound and I have tried to be as succinct as possible however as this is not my area of expertise I would welcome the opportunity to explain the content of this response or to provide any additional information to the inspector in the public element of this process. To support me in this process I would also kindly request that my daughter attends to support me. Thank you for your time and consideration. I am happy to be contacted at any time by the inspector.

Policy EMP2
NE2

Employment Site Allocations

Reference **112 Mr L Wrigley** -

Number of supporters:

Commenting on - NE2 NE2

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

Please see supporting document in relation to Land North of Hud Hey (Please see appendix)

Please see supporting document in relation to Land North of Hud Hey

Do you wish to participate to the Examination In Public? **Yes**

Reasons To enable the inspector to have the opportunity to consider the points made and address questions that may arise.

Reference	5176 Mr	Warren	Hilton	Highways England	Number of supporters:
Commenting on				NE2	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<ul style="list-style-type: none">• Land North of Hud Hey (EMP 13) – It is proposed that the existing site access to the industrial estate would be utilised with the priority junction improved, and an extensive internal link road provided to open up the site for development. Development traffic would join the local road network and access the SRN via existing junctions. However, we note that the proposed access is immediately adjacent to the A56 overbridge abutments and highway verge, which may impact upon the ability of HGV vehicles to safely and efficiently access the site.					
ADD 6 – Extension to Carrs Wood Industrial Estate (access from Hud Hey Road) & EMP 13 Land North of Hud Hey					
As for the comments above in relation to an access from Commerce Street, the creation of accesses to both the proposed employment sites at Carrs Wood and the Land North of Hud Hey pose geotechnical risks to the A56 trunk road embankments and abutments of the Hud Hey Road bridge over the A56. Therefore, a detailed feasibility study should be carried out to find out whether an optimum solution can be achieved that poses no safety risk to the A56. This should be carried out using specialist and appropriately-qualified geotechnical expertise. Where there is a geotechnical risk to the SRN, this work must be undertaken in accordance with the Design Manual for Roads and Bridges standard HD22/08 ‘Managing Geotechnical Risk’ (available on the internet). This process should begin as soon as practicable to allow a detailed study to be carried out which will assist in understanding the viability of the proposal.					
The complications associated with this site (in particular the Commerce Street access proposal) are so great that, in our view, it is not appropriate for a developer to be faced with attempting to resolve them at planning application stage. They need to be resolved before the site is formally allocated within the Plan, as they are highly likely to affect site viability.					
Updated comment:					
ADD 6 – Extension to Carrs Wood Industrial Estate (access from Hud Hey Road) & EMP 13 Land North of Hud Hey					
As for the comments above in relation to an access from Commerce Street, the creation of accesses to both the proposed employment sites at Carrs Wood and the Land North of Hud Hey pose geotechnical risks to the A56 trunk road embankments and abutments of the Hud Hey Road bridge over the A56.					
For the same reasons as indicated given above, a detailed feasibility study should be carried out to find out whether an optimum solution can be achieved that poses no safety risk to the A56. This should be carried out using specialist and appropriately-qualified geotechnical expertise. Where there is a geotechnical risk to the SRN, this work must be undertaken in accordance with the Design Manual for Roads and Bridges standard HD22/08 ‘Managing Geotechnical Risk’ (available on the internet). This process should begin as soon as practicable to allow a detailed study to be carried out which will assist in understanding the viability of the proposal.					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Policy EMP2
NE2

Employment Site Allocations

Reference **5197 Mr**

Marcus

Hudson

Lancashire County Council

Number of supporters:

Commenting on

NE2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

EMP 13 The priority junction as suggested seems acceptable in terms of an access arrangement. However the difficulties highlighted above for ADD 6 regarding access from the site to the A56 via the Brook Street signalised crossroad junction would remain a concern, specifically with regards larger HGV type vehicular traffic.

EMP 2.15 – A new vehicular access onto Blackburn Road would require a major earth moving exercise and the removal of mature trees within the site. An LCC retaining wall bounds Blackburn Road and the required visibility splays would be a concern. Access via the existing Industrial Estate appears unachievable without the removal of an existing industrial building.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

NE3

Reference **21 Mrs Kath Lees** - Number of supporters:

Commenting on - NE3

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

First of all, have you reviewed the necessity of more industrial units for Rossendale, in particular Haslingden. Because as a resident we seem to have a lot of units that are empty, both at Carrs Industrial and Rising Bridge. Surely it would be common sense to fill these before putting up corrugated metal units in an otherwise green country side that boasts of being a 'valley'. Once a need has been identified, then it should be considered. Extending Carrs Industrial Estate may seem logical but has it been reviewed honestly? The plans seem to imply that Hud Hey Road carpark is the most suitable for a road to feed the extension, I most strongly object. The carpark belongs to the residents, I was told this by my solicitor when I bought the house in 2003. Most residents have been here 20-30 plus years. The carpark lies over the sewer pipe. The carpark lies over the water culvert. The carpark is lined over one large corner with Japanese knotweed. The carpark is a public right of way, across the stile into the field. The carpark is a safe area for children and grandchildren to play, walk. The neighbours need access to the rears of the properties. Then we can look at the road. Hud Hey Road/Haslingden Old Road is a single lane road, all the way along, it cannot take heavy goods vehicles, or indeed more motor vehicles. The road has been marked to try and put some safe parking for the residents and the lower end of Hud Hey towards Brook Street are indeed putting their cars on the pavement because the speed at which vehicles come down the one-way Hud Hey from Blackburn Road is scary and dangerous. Also the heavy good vehicles that try to judge the turn onto Brook Street and amount the path is also very dangerous. The entry from Blackburn Road can not take this traffic. The other side of the A56 bridge, the carpark and upwards have had increased traffic and HGV's since the restrictions were put on the Grane Road. This has already caused one death that I know of, despite the road being marked from the national speed limit to a 30 limit. We have 'out of use' buses even using our road and we don't have a bus service of our own. Our road is becoming a rat run and a dangerous one at that.

The extension to Carrs Industrial suggests that the carpark off Hud Hey is the most suitable, yet it did not have a timescale of when this land could/would become available. When asked by my neighbours it was suggested that this was a clerical error. I am afraid, I as one, do not believe this and think there is something going on. The farmer is known to have said over his dead body would he sell the land. Unless there is something more we should know. As for it being the most suitable, I think even a junior level headed human being would say that another exit off the A56 is the most suitable, but apparently the highways have been approached and refused. So, the next most suitable would be the existing exit and the bridge over the A56 being adapted to take the extra vehicle traffic. This is in a more unresidential area, so therefore safer.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons -

Reference	57 Mr	Mark	Turner	-	Number of supporters:
Commenting on	-	-	-	NE3	
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Yes
<p>Whilst we accept that change is inevitable what we strongly disagree with is the scoring system used to determine suitability in relation to Carrs Industrial Estate Northern Extension (ADD6) - in particular I note the following - Environmental Constraints - The proposed access east of properties on Hud Hey Road has an existing culvert and drains running directly below the existing residents car park area which should raise significant costs concerns Road Safety Implications - The inspector scored a 0, This is clearly not correct as any access that may be established at this point will have huge risks and increase in potential road traffic accidents due to the fact that Hud Hey Road is a B Classification road (B6236). Since the removal of traffic from the Grane Road (B6232) road traffic has increased significantly and the addition of an access road would severely exacerbate the risk of accidents and congestion - please see additional photographs of heavy goods vehicles taken at this point on the road to fully understand that this road is just not suitable Physical Constraints - It would extremely difficult to incorporate a new access as recommended in the report - this access is directly next to a motorway bridge, is a sloping site and is quite narrow leaving little or no room for traffic such as heavy goods to pass at the same time - this will cause potential for traffic to back up during busy periods of the day and enhancing significantly the risk of accidents Ease of Access - The properties to the east of the motorway bridge have right of access to the rear of the properties for maintenance / bins / property access etc - this would therefore narrow the proposed access further still and is just not feasible - the inspector scored 2 which suggests he has no knowledge of the above comments and surely this should be a score of -3 Suitability for large goods vehicles - a neutral score just does not make sense, a -3 is the appropriate score for this point - see attached photographs</p>					
Do you wish to participate to the Examination In Public?	No	Reasons	-		

Reference **67 MRS CHRISTINE HOLDEN** -

Number of supporters:

Commenting on - Policy NE3

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Yes**

I do not consider the Local Plan to be sound as the study relating to the proposed access point to service the Carrs Industrial Estate Extension, is flawed and fails to sufficiently address the following pertinent points:1. Road Safety2. Ease of access

I strongly object to the proposal that the carpark next to 116 Hud Hey Road Haslingden is a suitable access point to service Carrs Industrial Estate Extension. Objections:Road Safety1. This section of the B6236 is a well known speeding blackspot which in recent years, has prompted the police to introduce speed calming measures such as mobile interactive signage, mobile speed monitoring and a permanent interactive sign. These measures have had limited impact as the volume of traffic has increased and coupled with their excessive speeds, the proposed access point is unsafe and will contribute to more traffic accidents on this road.2. There are young children who live on this row and play behind their homes next to the carpark. There is also a disabled elderly person and other elderly people who live on this row. The route which HGVs would be taking to reach the proposed access point, is one used by children walking to school who have to already cross a road filled with speeding traffic. This would increase the volume of traffic and add to the potential for more road vehicle accidents. 3. The main route from the A56 to Hud Hey Road is along the A680 Blackburn Road. HGVs are turning down the one way system but more often, turning into Brook St at the traffic lights near Worsley Park. They have to cross the white line to negotiate the turn from the main Blackburn Road Haslingden. This is an existing problem but will be made far worse due to an increase in the number of large vehicles travelling along this route to reach the proposed access point.

Ease of Access1. This section of Hud Hey Road Haslingden is very dangerous for pedestrians and other road users due to the volume of traffic speeding excessively in both directions. Lancashire County Councillor Dave Stansfield is currently working with the police and Highways in a bid to secure the installation of average speed cameras along this route.2. This section of Hud Hey Road is very busy at peak times and we struggle to exit the carpark. 3. It is a tight turn to turn left or right to access or exit the carpark. Visibility is severely restricted for residents whether they are exiting the carpark to turn left or right. This is partly due to parked cars and also to HGVs illegally parking on the pavements near to the entrance. The development of Carrs Industrial Estate has the potential to increase the risk of this existing problem. 4. Parking is already a problem for residents and the proposed access point would only serve to move another 8 vehicles on to the road which in turn adds to the potential for traffic accidents as heavy goods vehicles struggle to negotiate this entry/exit point. I am submitting photographic evidence to support these objections including photos showing excessive speeds on Hud Hey Road, the unsuitability of the road for an increase in heavy traffic, parking illegally on the pavements and the unsuitability of Brook St as the main access point to Hud Hey Road.

Do you wish to participate to the Examination In Public? **Yes**

Reasons I consider it necessary to attend the oral part of the examination as I have lived here for 33 years and have anecdotal evidence in support of my objections to the proposed access point. I feel strongly that this form does not allow sufficient space to adequately voice my concerns and I do not believe that I have received all relevant information which has been made available to Rossendale Planning Committee during this consultation process. I therefore question its transparency.

Reference	68 MR	ANDREW	HOLDEN	-	Number of supporters:
Commenting on	-		Policy		NE3
Is the Local Plan legally compliant?	Yes		Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate? Yes
<p>I consider the Local Plan is unsound as it is flawed due to the fact that the study has failed to adequately address road safety and ease of access concerns for this proposed access point.</p> <p>I strongly object to the proposal that the carpark next to 116 Hud Hey Road Haslingden is a suitable access point to service Carrs Industrial Estate Extension. Objections:Road Safety1. This section of the B6236 is a well known speeding blackspot which in recent years, has prompted the police to introduce speed calming measures such as mobile interactive signage, mobile speed monitoring and a permanent interactive sign. These measures have had limited impact as the volume of traffic has increased and coupled with their excessive speeds, the proposed access point is unsafe and will contribute to more traffic accidents on this road.2. There are young children who live on this row and play behind their homes next to the carpark. There is also a disabled elderly person and other elderly people who live on this row. The route which HGVs would be taking to reach the proposed access point, is one used by children walking to school who have to already cross a road filled with speeding traffic. This would increase the volume of traffic and add to the potential for more road vehicle accidents. 3. The main route from the A56 to Hud Hey Road is along the A680 Blackburn Road. HGVs are turning down the one way system but more often, turning into Brook St at the traffic lights near Worsley Park. They have to cross the white line to negotiate the turn from the main Blackburn Road Haslingden. This is an existing problem but will be made far worse due to an increase in the number of large vehicles travelling along this route to reach the proposed access point.</p> <p>Ease of Access1. This section of Hud Hey Road Haslingden is very dangerous for pedestrians and other road users due to the volume of traffic speeding excessively in both directions. Lancashire County Councillor Dave Stansfield is currently working with the police and Highways in a bid to secure the installation of average speed cameras along this route.2. This section of Hud Hey Road is very busy at peak times and we struggle to exit the carpark. 3. It is a tight turn to turn left or right to access or exit the carpark. Visibility is severely restricted for residents whether they are exiting the carpark to turn left or right. This is partly due to parked cars and also to HGVs illegally parking on the pavements near to the entrance. The development of Carrs Industrial Estate has the potential to increase the risk of this existing problem. 4. Parking is already a problem for residents and the proposed access point would only serve to move another 8 vehicles on to the road which in turn adds to the potential for traffic accidents as heavy goods vehicles struggle to negotiate this entry/exit point. I am submitting photographic evidence to support these objections including photos showing excessive speeds on Hud Hey Road, the unsuitability of the road for an increase in heavy traffic, parking illegally on the pavements and the unsuitability of Brook St as the main access point to Hud Hey Road.</p>					
Do you wish to participate to the Examination In Public?	Yes		Reasons	I consider it necessary to attend the oral part of the examination as I have lived here for 33 years and have anecdotal evidence to support my objections to this proposed access point. I also feel strongly that this form provides insufficient space to adequately voice my concerns.	

Reference **78 Mr James Collier** - Number of supporters:

Commenting on - employment land NE3

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

the proposal is to move the existing urban boundary and build new employment sites on land which is currently open countryside. the A56 forms the existing urban boundary and sets a clear line between open countryside to the north and west in the Huddersley area and urban land to the south and east. Changing the urban boundary and building on the open countryside to north side of the A56 (proposal NE3), is unnecessary urban sprawl in a district council and will undoubtedly lead to further urban creep by setting a new precedent for the area. 1. the case for further employment land within a 5 mile radius of the proposed site is unjustified, with little evidence within the proposals for unmet demand within the region. the few businesses who have expressed an interest in any new development on open countryside, should first be encouraged to fully utilise existing vacant employment land. the proposed new land is to be considered an extension of the existing Carr road site (NEV5), however as of October 2018, there is over 100,000m2 of unlet business land on the existing Carr Road site (NEV5), this alone should be evidence that the district council has not undertaken a thorough analysis of unmet demand for new employment land within this specific area. a quick online search for business premises to let/for sale within 5 miles shows hundreds of vacant employment units as of October 2018, all with similar access to roads and other infrastructure. 2. Furthermore, any reasonable development plan should propose to develop existing brown field sites prior to considering any development on open countryside, Once development is undertaken on open countryside, the character of the area and the habitat for wildlife and way of life for rural residents changes irreversibly. it is therefore requested that the plan be amended to insist Rossendale council phase all development to ensure that the council first develops unused brownfield sites (such as EE12) and can then attract business to those sites, prior to development of any green field sites or open countryside, surely if there is not a legal requirement for such considerations, then it should be common sense for any planners or political decision makers. Again we only look within a couple of miles of the proposed NE3 site to find new employment land developments which remain unoccupied /unsellable (e.g. the units at EE27)

Suggested action/amendments to be taken: 1. to question the evidence put forward in terms of unmet demand for additional employment land within Rossendale. to do this by undertaking a survey of unused employment units within a 1- 5 mile radius of any new sites and referencing the results within the plans alongside any case for unmet demand. such a survey should take account of the size, type and location of unlet employment units and the length of time units have been unoccupied. 2. to add a new condition to the plans (either specific to each new proposed site, or a general condition applying to all proposed sites) which phases the plans in such a way that prior to commencing any new development on greenbelt, open countryside or changing the existing urban boundaries, the local council must first be satisfied that it has exhausted its development options on existing brownfield sites within the existing urban boundary and that in addition to these existing brownfield sites being developed first, in the case of additional employment land, any new employment developments on brownfield land should have secured businesses to occupy the sites and there be sufficient evidence of unmet demand for further sites before developing on greenbelt/ open countryside or changing the urban boundaries, such phasing would ensure development on non brownfield land only takes place if there is evidence of sufficient demand and prevent the unnecessary destruction of Rossendale's green valleys.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	5164 Mr	Walter	Barnes	Number of supporters:
Commenting on			EMP2	NE3
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate? Did not answer
<p>The allocation of Site NE3 (Carrs Industrial Estate north extension, Haslingden) is supported. The landowner (Walter Barnes) is willing to make his land available for employment development. Mr Barnes' children (Andrew Barnes and Isabel Stolar) are also supportive of the proposed allocation.</p> <p>The site is suitably located and would comprise an extension of an existing industrial estate. Direct access to the site could be obtained from the A56. Alternatively, a link could be made to the existing industrial estate to the south and its existing junctions off the A56 used to serve this proposed employment site. There are no known reasons why a safe access into and out of the site cannot be provided.</p> <p>The site is ideally located for business purposes. It is adjacent to an existing major 'A' road that provides excellent access links. This will be a key consideration for the occupiers of any new business units, and therefore helps to demonstrate that employment development on this site would be viable.</p> <p>There is also easy access to an available workforce from the town of Haslingden, which is to the south east.</p> <p>The site can easily be accessed by the workforce by means other than the private car. For example, the workforce would be able to either cycle or walk to the site. The proposed new employment allocation is therefore a sustainable location for a new business site.</p> <p>The site is also reasonably flat and is not identified as an area of flood risk by the Environment Agency flood risk maps. The District of Rossendale has an undulating topography and therefore such sites are very limited.</p> <p>The site is therefore an obvious choice for a new employment allocation.</p> <p>In terms of impact on the local landscape, this will be very minimal. The site will be in a valley enclosed by a steep hillside to the west and the dual carriageway which forms the A56 to the east. There are other employment premises to the south and on the opposite side of the dual carriageway to the east. Overall, the site will be in keeping with the character and appearance of the surrounding area.</p> <p>In summary it is therefore appropriate to release the land for development, to help meet the Council's employment needs. Providing employment development on the land would not have any unacceptable impacts.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		

Reference **5176 Mr**

Warren

Hilton

Highways England

Number of supporters:

Commenting on

NE3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

• Carrs Industrial Estate Extension (ADD 6) – An access from the A56 was considered, but discounted due to being contrary to the Department for Transport’s Policy Circular 02/2013 and the terms of Highways England’s operating Licence with the secretary of State. Due to this lack of support from Highways England, access was proposed to be provided via Hud Hey Road. Development traffic would join the local road network and access the SRN via existing junctions. However, we note that the proposed access is immediately adjacent to the A56 overbridge abutments and highway verge, which may impact upon the ability of HGV vehicles to safely and efficiently access the site. An alternative access to this site from Commerce Street is likely to be very difficult and expensive to achieve due to the level of earthworks involved and existing geotechnical constraints that pose a safety risk to the A56. This could well make any development unviable. Consequently, Highways England had previously advised the Council that the Employment Sites Study needs to consider this matter in great detail (i.e. undertake feasibility work to establish and agree with Highways England an outline design to be appended as a precondition to the allocation itself). The Study has so far not considered this matter. The Council is aware of Highways England’s concerns which are discussed in more detail further on in this letter.

ADD 6 – Extension to Carrs Wood Industrial Estate – access from Commerce Street

It has been suggested by the Council that this employment site could be accessed from Commerce Street at the point where an existing private means of access / accommodation road has a junction with Commerce Street. The developable land within the proposed allocation is located some 300 metres away from the junction, but is located some 30 metres lower than the junction with Commerce Street, with higher ground in-between.

The suggested access route runs along a contour ledge, midway up a significant cutting that was created when the A56 Haslingden Bypass was built (the A56 following the route of a disused railway and the cutting being formed after the removal of the North Hag railway tunnel).The cutting across which the existing access track/road runs was cut to a slope angle of about 1 in 3 to 1 in 4, which are quite shallow angles for highway cutting design and in themselves suggest that the design engineers for the A56 could not achieve appropriate stability for a steeper slope.

Our records of boreholes sunk for the slope design / construction indicate a significant thickness of glacial deposits which extend well below the toe level of the slope. The deposits contain a mix of layers of sands, gravels, silt and soft clays. In this combination, these materials are inherently difficult to work with and unstable. They are prone to the absorption of water, which adds to the weight of the material, making slope-failure likely. This is why our records indicate slope face drainage across both lifts of the slope (above and below the existing access track) which indicates that groundwater was encountered during construction and drainage was installed to control seepage and improve stability of these slopes.

The existing accommodation road is narrow and curved, which would be unsuitable for use by any development traffic. These bends are deliberate so the road follows the contours that have been created to aid the stability of the slopes above and below it. Creation of an access road to the proposed site allocation would need to be wider and have a straight forward alignment; sloping gradually over a significant distance to access the proposed development site. This would necessitate major earthworks (via cut and fill), along with the widening of the new access.

Widening would cut into the slope above and cause it to fail, which means that a significant retaining wall structure would be likely (the existing slope cannot be removed due to being part of the surrounding hillside).

The lower level land to the north, where development is being suggested, has boreholes data which recorded weak Alluvial soils and Peat, which also require careful consideration for development upon. There is a likelihood that placing surplus material from a cut and fill operation above this later will in itself be unstable, and may also result in the weight of depressing the existing ground beneath and pushing the surrounding ground (including the A56 carriageway) upwards, resulting in catastrophic damage to the road structure and carriageways. This area is also drained by a culvert passing below the A56 and this too needs consideration in any proposed scheme.

In summary, creation of an access at Commerce Street poses a significant risk to the safety and integrity of the A56 that would require significant earthworks and engineering

solutions; the cost of which may be uneconomic when weighed against the cost of developing the site itself. Due to the materials involved, there will need to be careful slope stability analysis of any changes that may be desired for the development. Changes at this location pose a risk to the stability of the abutments of the Commerce Street bridge over the A56, the slopes above the A56, as well as the stability of the carriageways.

Highways England therefore advises Rossendale Council that before taking any decision to allocate this site, it must arrange for a feasibility study to be carried out to find out whether an optimum solution can be achieved. This should be carried out using specialist and appropriately-qualified geotechnical expertise. Where there is a geotechnical risk to the SRN, this work must be undertaken in accordance with the Design Manual for Roads and Bridges standard HD22/08 'Managing Geotechnical Risk' (available on the internet). This process should begin as soon as practicable to allow a detailed geotechnical study to be carried out which will assist in understanding the viability of the proposal. Any solutions arising must first be agreed with Highways England. This work must be completed before the Local Plan is advanced any further.

The complications associated with this site (in particular the Commerce Street access proposal) are so great that, in our view, it is not appropriate for a developer to be faced with attempting to resolve them at planning application stage. They need to be resolved before the site is formally allocated within the Plan, as they are highly likely to affect site viability.

ADD 6 – Extension to Carrs Wood Industrial Estate (access from Hud Hey Road) & EMP 13 Land North of Hud Hey

As for the comments above in relation to an access from Commerce Street, the creation of accesses to both the proposed employment sites at Carrs Wood and the Land North of Hud Hey pose geotechnical risks to the A56 trunk road embankments and abutments of the Hud Hey Road bridge over the A56. Therefore, a detailed feasibility study should be carried out to find out whether an optimum solution can be achieved that poses no safety risk to the A56. This should be carried out using specialist and appropriately-qualified geotechnical expertise. Where there is a geotechnical risk to the SRN, this work must be undertaken in accordance with the Design Manual for Roads and Bridges standard HD22/08 'Managing Geotechnical Risk' (available on the internet). This process should begin as soon as practicable to allow a detailed study to be carried out which will assist in understanding the viability of the proposal.

The complications associated with this site (in particular the Commerce Street access proposal) are so great that, in our view, it is not appropriate for a developer to be faced with attempting to resolve them at planning application stage. They need to be resolved before the site is formally allocated within the Plan, as they are highly likely to affect site viability.

Updated comments:

ADD 6 – Extension to Carrs Wood Industrial Estate – access from Commerce Street

This proposed allocation is currently undeveloped land. It has been suggested by the Council that this employment site could be accessed from Commerce Street at the point where an existing private means of access / accommodation road has a junction with Commerce Street. The developable land within the proposed allocation is located some 300 metres away from the junction, but is located some 30 metres lower than the junction with Commerce Street, with higher ground in-between.

The suggested access route runs along a contour ledge, midway up a significant cutting that was created when the A56 Haslingden Bypass was built (the A56 following the route of a disused railway and the cutting being formed after the removal of the North Hag railway tunnel). The cutting across which the existing access track/road runs was cut to a slope angle of about 1 in 3 to 1 in 4, which are quite shallow angles for highway cutting design and in themselves suggest that the design engineers for the A56 could not achieve appropriate stability for a steeper slope.

Our records of boreholes sunk for the slope design / construction indicate a significant thickness of glacial deposits which extend well below the toe level of the slope. The deposits contain a mix of layers of sands, gravels, silt and soft clays. In this combination, these materials are inherently difficult to work with and unstable. They are prone to the absorption of water, which adds to the weight of the material, making slope-failure likely. This is why our records indicate slope face drainage across both lifts of the slope (above and below the existing access track) which indicates that groundwater was encountered during construction and drainage was installed to control seepage and improve stability of these slopes.

The existing accommodation road is narrow and curved, which would be unsuitable for use by any development traffic. These bends are deliberate so the road follows the

contours that have been created to aid the stability of the slopes above and below it. Creation of an access road to the proposed site allocation would need to be wider and have a straight forward alignment; sloping gradually over a significant distance to access the proposed development site. This would necessitate major earthworks (via cut and fill), along with the widening of the new access. Widening would cut into the slope above and cause it to fail, which means that a significant retaining wall structure would be likely (the existing slope cannot be removed due to being part of the surrounding hillside).

The lower level land to the north, where development is being suggested, has boreholes data which recorded weak Alluvial soils and Peat, which also require careful consideration for development upon. There is a likelihood that placing surplus material from a cut and fill operation above this later will in itself be unstable, and may also result in the weight of depressing the existing ground beneath and pushing the surrounding ground (including the A56 carriageway) upwards, resulting in catastrophic damage to the road structure and carriageways. This area is also drained by a culvert passing below the A56 and this too needs consideration in any proposed scheme.

In summary, creation of an access at Commerce Street poses a significant risk to the safety and integrity of the A56 that would require significant earthworks and engineering solutions; the cost of which may be uneconomic when weighed against the cost of developing the site itself. Due to the materials involved, there will need to be careful slope stability analysis of any changes that may be desired for the development. Changes at this location pose a risk to the stability of the abutments of the Commerce Street bridge over the A56, the slopes above the A56, as well as the stability of the carriageways.

Highways England therefore advises Rossendale Council that before taking any decision to allocate this site, it must arrange for a feasibility study to be carried out to find out whether an optimum solution can be achieved. This should be carried out using specialist and appropriately-qualified geotechnical expertise. Where there is a geotechnical risk to the SRN, this work must be undertaken in accordance with the Design Manual for Roads and Bridges standard HD22/08 'Managing Geotechnical Risk' (available on the internet). This process should begin as soon as practicable to allow a detailed geotechnical study to be carried out which will assist in understanding the viability of the proposal. Any solutions arising must first be agreed with Highways England. This work must be completed before the Local Plan is advanced any further, and Highways England is happy to guide the Council in this regard.

This is necessary because we have evidence that there are geotechnical constraints at this location (in particular resulting from a potential Commerce Street highway access point) of a nature where they will be fundamental to whether the site allocation, as proposed, is viable.

Therefore, it is critical and entirely appropriate that these matters be properly considered as part of the Local Plan development process and not left to for major problems to be identified as part of development management process. This is because, in order for a Local Plan to be adopted, a local planning authority must first be able to demonstrate that its allocations are actually sound and deliverable.

ADD 6 – Extension to Carrs Wood Industrial Estate (access from Hud Hey Road) & EMP 13 Land North of Hud Hey

As for the comments above in relation to an access from Commerce Street, the creation of accesses to both the proposed employment sites at Carrs Wood and the Land North of Hud Hey pose geotechnical risks to the A56 trunk road embankments and abutments of the Hud Hey Road bridge over the A56.

For the same reasons as indicated given above, a detailed feasibility study should be carried out to find out whether an optimum solution can be achieved that poses no safety risk to the A56. This should be carried out using specialist and appropriately-qualified geotechnical expertise. Where there is a geotechnical risk to the SRN, this work must be undertaken in accordance with the Design Manual for Roads and Bridges standard HD22/08 'Managing Geotechnical Risk' (available on the internet). This process should begin as soon as practicable to allow a detailed study to be carried out which will assist in understanding the viability of the proposal.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5197 Mr Marcus Hudson Lancashire County Council** Number of supporters:

Commenting on NE3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

ADD6 CARRS INDUSTRIAL ESTATE EXTENSION

In principal the site would be acceptable however the proposed new access indicated on drawing ADD6/01 onto Hud Hey Road causes significant concerns to the extent that we believe an alternative means of access should be sought.

The local highway network surrounding the new site access has a number of constraints that cannot be obviously mitigated against and there would be a severe impact upon existing residential parking provision along Hud Hey Road itself in order to ensure adequate visibility splays would be available.

The proposed site access is from the B6236 (known as Hud Hey Road, Roundhill Road, Haslingden Road) which forms a high speed, rural, high level link road to Blackburn and M65. It runs parallel to the Grane Road B6232 which has a 7.5 tonne weight restriction in place, implemented for safety reasons. Lancashire County Council has received numerous complaints from the residents of Hud Hey Road following the introduction of the weight restriction on Grane Road (circa 2008) that heavy vehicles have transferred onto the B6236. We believe the introduction of an Industrial Estate road as proposed would encourage HGV's from the site to travel along the B6236, rather than using the strategic road network, which would not be appropriate and would exacerbate existing concerns.

The route from the site to the A56 is via the Brook Street signalised crossroad junction which is constrained by buildings in close proximity to the road layout. The approach from Hud Hey Road is dog legged with two 90 degree bends over a short distance and a carriageway width of around 6.5 metres. The layout does not readily support an increase in heavy vehicle movements and may result in highway safety concerns should this occur. Difficulties in access would also likely encourage vehicle drivers to traverse along the B6236 which as highlighted above would be far from ideal.

The new site access would require adequate visibility splays on Hud Hey Road which would need the removal of parked vehicles and subsequently the introduction of parking restrictions along the frontage of 116-138 Hud Hey Road and on the bridge. This is likely to be very controversial and result in a number of objections from residents. Ultimately the outcome of any objection would not be an officer decision. Due the nature of the Traffic Regulation Order (TRO) process the County Council could not guarantee that visibility splays would be provided which results in safety concerns. There may be measures to partly mitigate this including the provision of off-street car parking to the rear of the properties, although this is unlikely to fully mitigate the issue as residents would lose the convenience of parking along the frontage of their properties.

Highways England have expressed concern about the new site access joining the bridge structure over the A56 and this concern is reflected by Lancashire County Council as the Local Highway Authority.

Having said all that there is potentially a point of access from Commerce Street that would be an appropriate access for HGV traffic and the vehicle movements generated by the development. This route links more directly to the strategic road network, A56 and the wider motorway network and would avoid the convoluted and unnecessary use of the local highway network and the subsequent difficulties outlined above.

EMP 2.23 – An access onto Commerce Street would require additional land. The existing private access road which joins Commerce Street would require widening. Access onto Hud Hey Road cannot not be achieved due to a number of highway safety related matters.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

NE4

Reference **5176 Mr**

Warren

Hilton

Highways England

Number of supporters:

Commenting on

NE4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

- Extension of New Hall Hey (EMP 11) – Access is proposed by utilising the existing roundabout access from the A682 and extending the existing access road at New Hall Hey Road. The proposed access junction may induce queues on the A682, but it is unlikely that this will impact the operation of the A56. However, Highways England note that the cumulative impact of the new junctions proposed on the A682 has not been assessed.
- New Hall Hey East (EMP 72) – This site is located adjacent to site EMP 11 and it is proposed to provide access via the existing roundabout access from the A682, with a link from the proposed extended access road to site EMP 11. A bridge would be required to provide access across the River Irwell to open up the site for development. The proposed access junction may induce queues on the A682, but it is unlikely that this will impact the operation of the A56. Nevertheless, the cumulative impact of the new junctions proposed on the A682 has not been assessed.

EMP 11 Extension of New Hall Hey, EMP 72 New Hall Hey East, Land South of New Hall Hey Extension and Land at Sykeside – detailed microsimulation modelling needed to assess the cumulative impact of the proposed junctions upon the A682 and A56 carriageways.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5197 Mr**

Marcus

Hudson

Lancashire County Council

Number of supporters:

Commenting on

NE4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

EMP 2.26 – There is no access to the highway network. Access through the parcel EMP2.31 should be secured however the recently approved employment site significantly limits the opportunity for access.

EMP 2.34 – Access is via Holme Lane which is a concern due to the local road layout and level crossing . The junction of Bury Road and Home Lane is restricted for vehicles travelling to and from the south. Access through parcels EMP 2.26 and 2.31 should be secured.

EMP 11 + 72 – The access onto the existing highway network seem achievable however major infrastructure works would be required to free up the land.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Site not allocated

Reference	5176 Mr	Warren	Hilton	Highways England	Number of supporters:
Commenting on			Site not allocated	Site not allocated	
Is the Local Plan legally compliant?	Did not answer		Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
<ul style="list-style-type: none">• Land Adjacent to Hollin Gate Farm (ADD 3) – Access is proposed by utilising the existing access to Hollin Gate Farm and providing a signalised junction on the A680 shared with adjacent local services or a roundabout junction, which would be located immediately adjacent to the A56 corridor at the Rising Bridge roundabout. We note that a junction or roundabout at this location could potentially impact upon the operation of the A56 roundabout junction at Rising Bridge. Potentially, northbound queues could extend onto the A56 roundabout junction, especially given the gradient and turning angle of the vehicles entering the proposed site. Further work is required to understand the cumulative impact that the proposed access arrangements would have upon the safety and efficient operation of the A56.• Land South of New Hall Hey Extension – It is proposed to provide access to the site via a new roundabout junction from A682, which would also provide access to the Land at Sykeside site. The proposed location of the roundabout junction could potentially result in traffic queues blocking back onto the A56. The proposed access junction may induce queues on the A682, and the cumulative impact of the new junctions proposed on the A682 has not been assessed.• Land at Sykeside – It is proposed to provide access to the site via a new roundabout junction from the A682, which would also provide access to the Land South of New Hall Hey West site. The proposed location of the roundabout junction could potentially result in traffic queues blocking back onto the A56. The proposed access junction may induce queues on the A682, and the cumulative impact of the new junctions proposed on the A682 has not been assessed.• Barlow Bottoms (EMP 65) – The site is located in the village of Whitworth and it is proposed to provide access via a new priority junction access from Millfold. Given the location of the site, no material impact is expected on the SRN. <p>ADD3 Hollin Gate Farm – detailed microsimulation modelling is needed to assess the impact of the proposed junction upon northbound traffic exiting the A56 carriageway at the Rising Bridge junction;</p>					

Do you wish to participate to the Examination In Public? Did not answer Reasons

Reference **5197 Mr Marcus Hudson Lancashire County Council** Number of supporters:

Commenting on Site not allocated

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

EMP2.38 – Direct access onto Blackburn Road is proposed through a signalised junction arrangement as indicated on drawing ADD6/01. This raises concerns due to the proximity to the A56 roundabout and the potential for queuing across the roundabout junction subsequently affecting highway safety on the strategic highway network of the A56 . Major earth moving would also be required which could potentially be a concern at this location. Access onto Rising Bridge Road and the strategic network if achievable would be ok however the route towards Accrington via Blackburn Road for HGV type vehicles would be a concern due to narrow carriageways created by heavy on-street residential and staff parking.

ADD 2 + EMP 71 – the access arrangement proposes a roundabout junction on the A682 shortly after the diverge from the strategic A56. There are existing 50 mph limit along both roads however speed compliance is a major issue. Visibility into the proposed roundabout from both directions is likely to be compromised due to existing road geometry which would be a concern. These issues mean that we should not support the proposed site access strategy.

EMP 73 – It is my understanding that the location indicated on the Mott MacDonald technical note reference 399721 001A is incorrect and that the site is actually 420m to the north opposite Studd Brow. Site access at this location appears readily achievable however the site is somewhat remote from the strategic road network.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 34

Comments on policy EMP3 Employment Site and Premises

Reference **5018 Brian Michael Kathy Fishwick Rossendale Civic Trust** Number of supporters:

Commenting on EMP3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support EMP3

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy EMP4 Development Criteria for Employment Generating Development

Reference **2 Mr John Lamb Lancashire Wildlife Trust Ltd.** Number of supporters:

Commenting on - EMP4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The set of criteria doesn't include any reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors, in accordance with the requirements of the NPPF.

Specific reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors, in accordance with the requirements of the NPPF. The NPPF requires development to deliver net gains in nature, hence an additional criterion could be the deliverability of a net gain(s) in nature, in particular to enhance sites, habitats or species populations relevant to any ecological networks that the site lies within or adjacent to.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5018 Brian Michael Kathy Fishwick Rossendale Civic Trust** Number of supporters:

Commenting on EMP4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support EMP4

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy **EMP5** **Employment Development in non-allocated employment areas**

Reference **5018 Brian Michael Kathy Fishwick Rossendale Civic Trust** Number of supporters:

Commenting on EMP5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support EMP5

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy EMP6 Futures ParkReference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

EMP6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support EMP6 and note it as: An area comprising 4.6 hectares at Futures Park, Bacup has been identified as having the potential to accommodate a flexible mixed use scheme, subject to national policy in the Framework and other relevant policies of this Local Plan. The area will require a well designed scheme that responds to the sites context, makes the most of environmental and leisure assets, takes account of the nearby Leisure facility at Lee Quarry and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements. Rossendale Council therefore requires a Masterplan for the development of this site. RCT note the mixed use aims, which need noting in other Policies, such as Retail R1, as a competitor to other centres.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

M4

Reference **8 Mr Paul Talbot** - Number of supporters:

Commenting on vi EMP6 M4

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

The Council's Plan is not positively prepared, justified and therefore will not be effective. Policy EM6 is seeking to encourage "new high quality development". The siting of a gypsy transit site is unlikely to encourage new business into the area, and existing local businesses near the proposed site are already expressing their concern that the Council is putting forward this proposal. The Council's Topic Paper comments on the Futures Park site as "prime employment land !" with the exclamation mark suggesting that it is more important to be used for employment than as a transit site. In addition, the local press commented recently on the possibility of land contamination. If such contamination exists, this will not be a good environment for businesses to trade from, let alone gypsy and travellers being resident there for however long they intend to use it as a stopover.

The Site Assessment report refers to site ref SHLAA16341 which does not have a poor RAG score but it would appear that the Council have not fully explored the site owner's intentions, as they are indicated as "not known" but yet concludes with the view that "It may be suitable for a Gypsy transit site because of the mixed nature of the surroundings and proximity to the main strategic road network though immediate access is poor." A poor access is not an insurmountable issue in my view. It is clear from Policy EM6 that master planning is required to develop this site. Including a transit site within this area will cause major problems with neighbouring uses and be impossible to deliver satisfactorily. The "Ride On" facility never happened allegedly due to the existence of the unauthorised gypsy site that you are now seeking to regularise, and I fear that similar opportunities for other quality employment uses will also be lost if the transit site remains in the Plan. For these reasons, I believe that the plan should be found unsound. I am unable to find any evidence of the Council's responsibilities under the Duty to Co-operate with regard to the provision of a gypsy and traveller site being discussed with neighbouring authorities within the Lancashire border. I am aware of some discussion with Calderdale however the site at Tooter Quarry was not pursued. To date, it appears that there is no evidence of 'collaborative working with all the neighbouring authorities' which is required under Paragraph 9 of the Planning Policy for Traveller Sites (PPTS) (2015). Finally, I believe that the residents of Bacup have been short changed yet again, as the opportunity to comment on a wider scope of issues relating to the Futures Park site have been denied them under Regulation 18, with your decision to move to Regulation 19 narrowing the focus for debate. It seems like everywhere else got the opportunity to comment in places like Barlow Bottoms etc but not residents of Bacup. This is unfair and appears to be the Council trying to regularise an existing unauthorised transit site to one that is there with the Council's blessing. I trust the Inspector will take residents concerns seriously.

Modify policy EM6 by removing criterion vi

Do you wish to participate to the Examination In Public? **No** Reasons -

Number of comments in this section 2

Comments on policy EMP7 New Hall Hey

Reference **71 miss** **suzanne** **haworth** - Number of supporters:

Commenting on - EMP7

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

I would like to strongly object to some of the the proposals to remove the protection of green belt from the land adjacent to the A56 to the River Irwell (site A) for employment use. This is to form the extension of the New Hall Hey project. Removing green belt protection from this area to allow development would severely disrupt the openness and beauty of this rural area. It would disturb the natural habitats of many wildlife found here including deer that are frequently seen there. The historic path to Rawtenstall which runs through this area along the river Irwell is extremely popular by locals and ramblers from all over the region. It is frequently used by bikers linking up with the Irwell vale bicycle route. It is also the route of the annual 'race the train' run as well as numerous other fun runs. It is an area of Rossendale of outstanding beauty hence the reason hundreds use the path every day. The drive for the nations health is to promote walking, cycling and outdoor activities and if any development was to harm the beauty of this path it would be a tragedy. The area adjacent to the river Irwell is also a massive flood risk and during the last storm of 2016, this area was completely covered by River Water.

I support the development of the policy EMP7 for the extension reaching the mature trees but to continue this development further towards Holme Lane would be a disastrous for Rossendale. The need for these employment sites also needs to be identified as I believe lots of industrial units are left empty in other parts of Rossendale close to the A56.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on EMP7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support EMP7 and note it as: An area comprising 6 hectares to the south of the A682 is a highly accessible part of the Borough and includes 2 distinct sites (the land between the A682 and the River Irwell (Area A and the land between the River Irwell and the East Lancashire Railway (Area B)) that are divided by the River Irwell. RCT also note the recent permission on the adjacent employment area for a very large shed, with no “masterplan” nor “visuals” for its presentation to this “gateway” location.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5119 Mr Richard Lester**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

B1.9 Objection is made to Policy EMP7: New Hall Hey on the ground that it is unsound for the reasons set out in paragraphs B1.1 to B1.7 above. Furthermore, it is unsound in that it fails to ensure compliance with paragraph 138 of the NPPF quoted at paragraph B1.7 above.

B1.10 The Strategy Topic Paper (page 13) refers to the site NE4. Its claim for exceptional circumstances relies on the discredited argument about shortage of employment sites: Land west of the River Irwell is in the Green Belt but it is considered that exceptional circumstances exist for its release given the lack of suitable, available employment land in the Borough close to the A56 corridor and the need to provide good quality jobs. The site will contribute to a balanced employment portfolio in an attractive location to the market; is viable and contributes to a balanced approach between housing and employment.

B6.2 Policy EMP7 is inherently unsound in that the items mentioned in the final paragraph of the Explanation should be in the actual Policy.

Do you wish to participate to the Examination In Public? **Yes**

Reasons

Reference **5176 Mr Warren Hilton****Highways England**

Number of supporters:

Commenting on EMP7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

'Policy EMP7: New Hall Hey' sets out the proposals for 6 hectares of employment development at the New Hall Hey site. The policy identifies the need for a Scoping Study, Transport Assessment and Travel Plan which are to be agreed with Lancashire County Council and Highways England. Whilst we would welcome the opportunity to assist with this assessment work, Highways England has concerns about the proposed access to this site. The 'Interim Rossendale Employment Sites Study' proposes new accesses on the A682 but the cumulative impact of the new junctions proposed (especially in terms of safety and the blocking-back of slower moving traffic onto the A56 northbound) has not been considered. Therefore, at this stage, it is not possible to fully understand any potential impacts upon the A56 (T) or the need for any proposed mitigation measures to be identified and assessed.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

NE4

Policy EMP7
NE4

New Hall Hey

Reference **5120 Mr Peter Wilmers**

Number of supporters:

Commenting on EMP7 NE4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I am strongly opposed to the development of further land at New Hall Hey. The appalling way in which the Council has wasted the potential of this prime flat site on the entry to Rawtenstall, allowing low employment density development in ugly buildings , both retail and the new workshop units, shows they cannot be trusted to ensure that the benefits in terms of a few new jobs would outweigh the desecration of this important landscape on the entrance to The Valley. They have never produced a master plan and have failed to ensure good design, good landscaping and sensible pedestrian access. This site should have formed an attractive entry into Rossendale, making use of its proximity to the steam railway, the Irwell and Rawtenstall to secure high quality development drawing in clients and visitors from a wide area, and creating good jobs in volume. It would be tragic to sacrifice further high quality land at New Hall Hey, when the balance of benefit is likely to continue to be so low. I hope these comments will be taken into account. I would be happy to do more work on this.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 5

Comments on policy **Employment** **Employment**

Reference **5160**

The Peel Group

Number of supporters:

Commenting on EMP1 to EMP7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

EMP1 to EMP7

9.23 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Chapter 3: Retail

Comments on policy R1

Retail and Other Town Centre Uses

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

R1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT give qualified support to R1, but Note:

A. Lower Cloughfold, alongside Bacup Road, is not identified as a neighbourhood centre or parade. Nor are large standalones: Musbury Fabrics in Helmshore, Winfields at Rising Bridge, Tesco at Sykeside, Rossendale Interiors in Stacksteads, and New Hall Hey's 3 Retail Parks.

B. NOTE so far not located gross retail areas to compare, BUT the WYG study does tend to confirm Planning Inspector's "is Rossendale shopped out" comment during Core Strategy Hearings in Public 2011. Also come to view that comparison shopping might be better viewed over-all Rossendale, rather than for each centre.

C. RCT note in particular these Sections from White Young Green's April 2017 Rossendale Town Centre, Retail, Leisure and Tourism Study. NOTE use of Primary and Secondary Shopping Area boundaries from 2011 Core Strategy, which include more area and longer walks in Rawtenstall than Bacup and Haslingden, and so should be treated with some caution, eg:

that the new Morrisons foodstore has not been accounted for as it falls outside the centre's current boundary. If this 2,231 sq.m was included in our analysis, then the proportion of convenience floorspace would be higher than the national average.

7.86 One reason for this is that whilst Rawtenstall town centre benefits from a very strong independent comparison goods retail offer, representation by national multiple operators is considered to be low for a centre of this size. An important factor is that Rossendale is surrounded by larger, higher order centres such as Bury, Burnley, Rochdale and Accrington which already accommodate these national multiples. As such, the commercial demand to gain representation in Rossendale as well is more limited, particularly as Rossendale residents are already likely to be travelling to these higher order centres (and retailers) to undertake their comparison goods shopping.

7.87 The other key reason is that Rawtenstall is considered to historically have had units of insufficient scale and format to accommodate the business models of many comparison goods focussed national multiples. However, this position is changing with the introduction of New Hall Hey Retail Park, the first phase of which involves a terrace of four large format units, whilst the second (which is under construction) involves a further three and an accompanying restaurant.

7.88 It should be noted that comparison goods retailer TK Maxx, which forms part of Phase I of the New Hall Hey scheme, opened following the undertaking of the household shopper survey in February 2016 and as such the influence of this new addition to the Borough's retail offer is not reflected in our results. Given that TK Maxx represents the largest fashion focussed retail unit in Rossendale, it is anticipated that it has had some positive impact on the Borough's ability to retain such comparison goods shopping trips. It has also evidently improved local consumer choice within this goods sector.

7.89 With some 1,493 sq.m (GIA) of modern, comparison goods floorspace remaining unlet as part of Phase I of the New Hall Hey scheme and a further 743 sq.m (GIA) available as part of the forthcoming Phase II, it is not considered that the planning authority needs to take any urgent action through their forthcoming plan to address a qualitative need for an improved comparison goods offer in the Borough. The existing and future floorspace proposed at New Hall Hey is considered to have the potential to attract the type of national multiples which are capable of improving the Borough's market share over the short to medium-term.

7.90 In terms of future comparison goods provision above and beyond that already approved and constructed at New Hall Hey; where need does arise, in the first instance this should be provided within Rawtenstall town centre's Primary Shopping Area, in accordance with the requirements of national planning policy.

D. RCT note that past actions have present consequences, and that New Hall Hey Retail Park was built against Officers advice to Members in their reporting on Application

13 December 2018

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2005/617 to DEVCON of 5 April 2006, in which they gave this:-

Recommendation

That planning permission be refused for the following reasons:

- 1) The applicant has failed to demonstrate that a need presently exists for the proposed development of a non-food retail park at this out of centre site of New Hall Hey which is contrary to PPS6: Planning for Town Centres.
- 2) The proposal fails the sequential approach to site selection in that there exist better located town centre and edge of centre opportunities for comparison shopping development that would better support the existing town centre shopping function and are therefore contrary to PPS6: Planning for Town Centres and Policy 16 (Retail, Entertainment and Leisure Development) of the Joint Lancashire Structure Plan 2001-2016.
- 3) The applicant has failed to demonstrate that the proposals would not adversely affect the vitality and viability of Rawtenstall town centre which is contrary to PPS6: Planning for Town Centres.

RESOLVED:

That members of the Committee be minded to approve the application as a refusal would be detrimental to the future of Rossendale and that the Chief Executive in consultation with the Officers and the Chair be given delegated authority to determine the conditions to be attached to the consent together with the Heads of Terms in respect of a Section 106 Agreement and to issue a decision notice if the application is not called in by the Government Office.

Reasons

Having taken into account all relevant material planning considerations, this committee considers that planning permission for this proposed development should be resolved to be granted (subject to a Section 106 agreement relating to sustainable transport initiatives and highway works) because in our judgement its positive impacts in terms of the wider economic, environmental, social and physical regeneration opportunities and benefits which the scheme will bring to the local community and to the town, are all key issues which, when weighed in the balance with other factors, should be given conclusive weight in this case. In addition, the approval of this application will have very positive and significant sustainable development benefits resulting from the reduction in car-borne journeys made by many people who currently travel out of the Valley to do their non-food shopping and to access leisure facilities that are not available locally. Taken together, it is the view of Committee that these positive regeneration and other benefits plainly outweigh any perceived objections to the development including those based upon retail capacity, need, or potential negative impacts on the town centre's future vitality and viability.

E. RCT note, with New Hall Hey Retail Park, these particular Representations, 23/05/2016, on Major Application 2016/0129: Erection of 3no. Retail Units (A1) and a Restaurant/Refreshment Unit (A1/A3/A5) with associated access, car parking, and landscaping. Land off Swanney Lodge Road, Rawtenstall, Rossendale.

1. Design and Access Statement submitted by the Applicant shows proposals for 3557 sq.m gross retail area, to add to New Hall Hey Retail Park's existing 6182 sq.m, of which 3,817 sq.m gross is at ground floor level, to give this Out of Centre Retail Park a new gross retail area of 9739 sq.m, and to increase its car parking from 157 to 381 spaces.
2. Rawtenstall Town Centre estimated net Primary Shopping Area is 5911 sq.m and its Secondary is 6543 sq.m. Its public car parking for shoppers, workers, commuters and residents is 281 Long Stay + 171 Short Stay = 452 + On-street c118 = Total c570 Spaces.
3. Rossendale Local Plan Core Strategy 2011. This was subject to Hearings in Public before a Planning Inspector, who considered it in relation to the new National Planning Policy

Framework, and, as adopted by Rossendale Borough Council, it does not support food sales at New Hall Hey:-

AVP 4: Strategy for Rawtenstall, Crawshawbooth, Goodshaw and Loveclough

New Hall Hey will be safeguarded for bulky goods retail and business use. An extension for business use of land to the south of Hardman's Mill will be favourably considered subject to flood risk issues being fully addressed.

4. National Policy on retail locations. RCT note NPPF's S2 Ensuring the vitality of town centres, where the definition of Edge of Centre, shows this as within 300m of a Primary Shopping Area. New Hall Hey is far Out of Centre at c.800m.

5. RCT would remind Members that, having given Planning Approval 2007/030 for the erection of 3 retail units measuring 3358 sq.m, 1412 sq.m and 1412 sq.m, these units were constructed by August 2010; and then remained vacant until Members were persuaded in 2014 to allow a variation of the conditions, attached to this 2007 planning permission, so that 1,162 sq.m of the gross floor space (Unit A1) can sell all Class A1 goods, including food, drink and clothing, along with ancillary uses. In order, it appears to RCT, to bring a M&S Simply Food to Rossendale; a decision that looks to have "trumped" both local and national planning policies and their intentions to ensure the vitality of town centres.

6. Rawtenstall Town Centre Retail Growth and Potential. RCT suggest that if a need was not evident in 2006, it certainly isn't now. Did Rawtenstall, or Rossendale, really need this Out of Centre's M&S's 1162sq.m of Simply Food sales, when it had a new Asda, Lidl, Tesco, B&M's 340sqm of food sales in the 3543 sqm ex Focus DIY, the Valley Centre cleared for redevelopment, and the vacated New Hall Hey Station Court: 2181sqm gross, c150 car spaces.

RCT estimate net retail, from VOA data, shows Rawtenstall Town Centre's:- Primary 5911sq.m, Secondary 6543sq.m, Edge 20203sqm to total 32657sqm. The real change for Rawtenstall was Asda's 10986sqm nett, 13106sqm gross.

F. RCT note LCC's Lancashire Profiles, which shows gross retail area in Rossendale: 974 - 90,000sqm, 1998 - 92,000sqm, 2008 - 119,000sqm or 29% Lancashire's No 1 for growth in retail space to Hyndburn's 16.6%, and Burnley's 13.5%.

Town	Population	Gross Retail sm	Sqm/head
Chorley	104,00	173,000	1.65
Rossendale	67,30	119,00	1.77
Blackburn+Darwen	140,70	120,00	2.22
Hyndburn	81,60	196,000	2.40
Preston	132,00	457,00	3.46

Does this show the effects of being close to larger centres?

Maybe, but then take the situation of a large town, close to both other large towns, and also city centres. We see Warrington, where a main high street Boots has moved into a Debenhams expanded Golden Square, and its site is now proposed for a smaller Retail Market. Where a population growth from 122,300 in 1968 to 202,228 in 2011, relates to a 55% reduction of town centre shopping floorspace to 4.8 sqft per person – 0.45 sqm/p, but its gross retail of c296,000 sqm is only 1.46 sqm/p.

Or are we also seeing the effects of the change to larger retail units with more efficient use of space: better ratios of net to gross areas: 49-51 Bank Street ex Woolworths' 49% to Asda St Mary's Way's 84%?

So note Rossendale's recent growth: Tesco x 2, a new Asda, a Lidl, Bacup's 2022sqm Morrisons, and a B&M with Planning Permission for 340sqm of food sales in the 3543 sqm ex Focus DIY. Did Rawtenstall or Rossendale need an Out of Centre 1162sqm of food sales in M&S? And now an Aldi as part of 3557 sq.m gross retail area, added to New Hall Hey Retail Park's existing 6182 sq.m.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5169****ASDA**

Number of supporters:

Commenting on

R1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy R1 – Retail Hierarchy

This Policy sets out the borough's retail hierarchy as follows:

- Town Centre: Rawtenstall;
- District Centres: Bacup, Haslingden;
- Local Centres: Crawshawbooth, Waterfoot, Whitworth; and
- Neighbourhood Parade: Stacksteads, Helmshore, Edenfield and Facit.

ASDA fully support the need and importance of establishing and maintaining a hierarchy of centres within the Rossendale Borough in order to adequately service the day to day retail and community needs of the local population.

Rawtenstall Town Centre

ASDA Rawtenstall is located within Rawtenstall Town Centre. Rawtenstall is the largest of the retail centres in the borough and sits at the top of the retail hierarchy. This centre provides a wide range of goods and services to serve the needs of the whole borough. The town centre includes a range of main town centre uses including banks, restaurants, bars and shops.

Rawtenstall Town Centre should be retained as a Town Centre and sit at the top of the retail hierarchy. Its role and function should be strengthened within the Rossendale Borough.

Given this, the proposed retail hierarchy set out in this policy is considered to be sound.

Policy R1 – Rawtenstall Town Centre Boundary and Primary Shopping Area

Policy R1 goes on to confirm the town centre boundary and Primary Shopping Area (PSA) boundaries for Rawtenstall Town Centre as illustrated on the draft Proposals Map.

Dealing firstly with the proposed town centre boundary, this is considered to accord with the definition set out in the NPPF, which is unaltered in the recent NPPF update (2018), and as such is sound.

ASDA welcome the retention of their store within the town centre boundary recognising the range of services it provides including pharmacy and opticians as well as clothes shopping. Furthermore, the store serves as a key attractor to the town centre which in turn helps to promote linked trips with other retail and service uses within the town centre.

In terms of the proposed Primary Shopping Area boundary, the draft boundary is unsound in that it does not accord with definition set out in the updated NPPF and is not justified for the reasons set out in the following paragraphs.

It is noted that the proposed Primary Shopping Area boundary reflects that which is recommended by the Council's Town Centre, Retail, Leisure and Tourism Study at Appendix 6. This retail study was published in April 2017 and therefore does not take into account the amended guidance and definition in respect of Primary Shopping Areas.

Given this, it is necessary to consider how the definition of the primary shopping area has been amended through the recently published NPPF. The updated NPPF glossary defines the primary shopping area as:

'Defined area where retail development is concentrated'.

In comparison, the previous version of the NPPF (2012) which the 2017 Retail Study will have had regard to, defined the primary shopping area as:

'Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping area)'.

As is apparent, the primary shopping area now no longer needs to have consideration to primary and secondary shopping frontages with the new NPPF removing the need to

identify such frontages.

This is relevant as the ASDA store is an area where retail development is concentrated although, given its scale and associated car parking does not necessarily fall within what would previously have been considered as a primary or secondary retail frontage.

It is clear that the Retail Study would have considered the former NPPF definition of primary shopping area when advising on the proposed boundary and as such it is necessary to reconsider the primary shopping area rather than relying upon the evidence base which, on this very specific matter is considered out-of-date.

The ASDA store is located adjacent to the currently defined primary shopping area, which extends along Bank Street, as well as the proposed extension to the primary shopping area. As such, it is evidenced that both the local planning authority and the evidence base agree that this area of Bank Street is an area where retail development is concentrated.

There are good pedestrian crossing facilities across St. Mary's Way between the Asda store and the rest of the town centre promoting linked trips between the two.

It is therefore concluded that the primary shopping area defined by Policy R1 and illustrated on the proposals map is inconsistent with national policy.

The ASDA store is a valuable component of Rawtenstall town centre. Its location boosts the vitality and viability of the town centre and encourages visitors to the town centre to make linked trips. Indeed, it is noted that the Retail Study concludes at paragraph 10.40 that the ASDA store helps to 'generate linked shopping trips with the [town] centre'.

As such, the superstore should be given appropriate protection from out of centre shopping to ensure that it continues to contribute towards the vitality and viability of Rawtenstall Town Centre allowing customers to make linked trips within the rest of town centre. By extending the PSA area to include the superstore, this would provide the store the appropriate protection.

Given this, the exclusion of the ASDA store from the primary shopping area cannot be considered to be justified as Policy R1 would fail to afford protection to a key anchor retail store from out-of-centre development proposals and would thus fail to protect the ongoing vitality and viability of Rawtenstall Town Centre.

In order to make the policy sound, the Primary Shopping Area in Rawtenstall should be extended to include the ASDA Superstore.

Policy R1 - Retail Impact Assessment Threshold

Policy R1 goes on to confirm the threshold where impact assessments are required for retail, leisure and office developments located outside of defined centre boundaries.

ASDA support the floorspace threshold for retail impact assessments of 400sqm and feel that this would provide sufficient protection regarding the vitality and viability of Rawtenstall Town Centre. As such it is considered that this Policy is sound. Nevertheless, we would suggest that the wording of this element of the policy is reviewed to ensure

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5192****B&E Boys Ltd**

Number of supporters:

Commenting on

Toll Bar Business Park, Stacksteads

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan comply with the duty to co-operate? **Did not answer**

POLICY R1: RETAIL & OTHER TOWN CENTRE USES

3.17 The draft Proposals Map (Figure 3.2 above) shows that part of the site which fronts onto Newchurch Road, is included in a Neighbourhood Parade. In addition to the site being promoted for a housing allocation, we wish to oppose the designation of part of the site being located within a Neighbourhood Parade.

3.18 Chapter 3 of the Draft Local Plan relates to Retail, with draft Policy R1: Retail and Other Town Centre Uses confirming that Neighbourhood Parade boundaries are identified on the Proposals Map, including Stacksteads.

3.19 The Policy states that development proposals will be expected to maintain or strengthen the retail offer and vitality and viability of Neighbourhood Parades. The Policy further states that:

“Proposals that require planning permission which would result in the loss of A1 uses in the PSA of the town, district and local centres will only be supported where:

- It would make a positive contribution to the vitality and viability of the relevant centre;
- It would not result in a significant break in retail frontage or lead to the loss of retail floorspace at a scale that would be harmful to the shopping function of the centre or which would reduce the ability of local communities to meet their day-to-day needs within the centre;
- It is compatible with a retail area and would maintain an active frontage and be immediately accessible to the public from the street; and
- There would be no significant adverse impacts on the character of the area, the amenity of local residents, road safety, car parking or traffic flows.”

3.20 Whilst the frontage of the subject site has been included as a Neighbourhood Parade the building is not suitable for such a retail use and offers no active frontage. This is reflected in the fact that was not allocated for retail use in the adopted version of the Proposals Map2.

3.21 As previously mentioned the site is only partially occupied and the rental income is not viable. It is a dated premises which lacks modern facilities, safe car parking areas and is difficult to access for deliveries and other servicing purposes. It does not have an active frontage onto Newchurch Road as shown below (with a large part of the site actually having a blank frontage) and therefore would not maintain or strengthen the retail offer in Stacksteads.

Figure 3.4 Street view looking east along Newchurch Road

3.22 The loss of these units from this part of the Stacksteads Neighbourhood Parade would not harm the objectives of draft Policy R1 as the loss of these inadequate retail premises would not harm the shopping function of the centre, nor would it reduce the ability of the local communities to meet their day-to-day needs within the centre. The majority of the frontage is currently not in retail use, nor has it ever been. Indeed, this could only be achieved through the demolition of the existing buildings. Unfortunately, as evidenced by the parade of vacant shops further towards Rawtenstall, along Newchurch Road, demonstrates the difficulty of operating a viable retail business in this location. Simply designating a frontage will not create retail activity, nor will it protect existing retail uses; there are none. Perversely, therefore, the designation of retail frontage by the Council must accept the redevelopment of the subject site, which would involve the demolition of the listed building to have any chance of being successful. The evidence on the ground suggests retail use success would not be forthcoming without demolition and redevelopment of it all. With demolition being required in principle, the retention of the listed building, in this instance, should not preclude redevelopment for any viable use. In our opinion, the only viable use of the site is for housing.

3.23 The proposed Stacksteads Neighbourhood Parade designation extends along Newchurch Road to the west and east of the subject site. There are natural breaks in built form either side of the subject site i.e. to the west (adjacent to the Rose ‘N’ Bowl public house where the Toll Bar building gable end meets the public right of way between the subject site and the public house), and to the east (to the rear of properties on Commercial Street). The Toll Bar Business Park effectively sits on its own and does not form part of a row of shops and could therefore easily be excluded from the proposed Neighbourhood Parade.

3.24 To that end, the Neighbourhood Parade designation should not extend into the boundaries of the subject site to enable the full and proper redevelopment of the subject site for alternative uses such as housing.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 3

Comments on policy **R2** **Rawtenstall Town Centre Uses**

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on R2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support the hopes in R2, but ask where's the nice big landscaped car park.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy **R3** **Development and Change of Use in Ditsrict and Local Centres**

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on R3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support R3.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5192****B&E Boys Ltd**

Number of supporters:

Commenting on

Toll Bar Business Park, Stacksteads

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan comply with the duty to co-operate? **Did not answer**

POLICY R3: RETAIL

POSITIVELY PREPARED

4.8 As demonstrated in Chapter 4 Toll Bar Business Park is not suitable for being allocated within a Neighbourhood Parade. The site is only partially occupied and the rental income is not viable. It is a dated premises which lacks modern facilities, safe car parking areas and is difficult to access for deliveries and other servicing purposes. It does not have an active frontage onto Newchurch Road and therefore offers nothing in terms of retail to the area. For these reasons Policy R3 has not been positively prepared by allocating Toll Bar Business Park as a Neighbourhood Parade.

JUSTIFIED

4.9 Policy R3 fails to plan properly for Stacksteads as it allocates part of the site as a Neighbourhood Parade where there is no justification or prospect the site would be suitable for retail. The site does not provide traditional retail frontage and should therefore be excluded from being allocated as a Neighbourhood Parade.

EFFECTIVE

4.10 The preceding sections of this document have explained how Toll Bar Business Park is not suitable to be allocated as a Neighbourhood Parade; it is therefore not effective.

CONSISTENT WITH NATIONAL POLICY

4.11 As we have set out the Toll Bar Business Park is not suitable to be included in a Neighbourhood Parade. It is our view that this does not represent sustainable development and therefore does not comply with paragraph 151 of the Framework:

“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development.”

PROPOSED MODIFICATION

4.12 The Council is respectfully requested to remove the site for being allocated as a Neighbourhood Parade in the Proposals Map and allocate the site for residential development under draft Policy HS2. Residential development in this location is considered appropriate in order to facilitate the viable regeneration of the site.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy R4**Existing Local Shops**

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

R4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support R4.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy **R5** **Hot Food Takeaways**

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

R5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support R5 subject to retention of: The development of hot food takeaways (use class A5) will be considered against the latest guidance published by the Council, currently the "Interim Statement on Hot Food Takeaways". The development of hot food takeaways will not be permitted on sites located within 250 metres of a school entrance, youth-centred facility or a park boundary.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5197 Mr	Marcus	Hudson	Lancashire County Council	Number of supporters:
Commenting on			Hot Food Takeaways		
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
3- Public Health: Health Equity, Welfare & Partnerships, Wider Determinants					
The Lancashire County Council response to the Rossendale Draft Local Plan Regulation 18 Consultation submitted on 9th October 2017 raised the issue of excess weight in young people in Rossendale and fast food takeaway density.					
Since then the Lancashire County Council Director of Public Health and Wellbeing has produced the Hot Food Takeaways and Spatial Planning Public Health Advisory Note (See Appendix 1). This advisory note provides an overview of weight across Lancashire and the prevalence of hot food takeaways. It also provides a review of planning policy options and makes recommendations for local authorities					
For the 3 year period 2013/14-2015/16 approximately 23% of reception year pupils and 34% of year 6 pupils had excess weight (www.localhealth.org.uk).					
Public Health England has determined that Rossendale has seen a 27% increase in fast food outlets (which includes the A3 use) between 2012 and 2016 and has a fast food takeaway density that is significantly above the England average.					
We welcome the inclusion of Policy R5: Hot Food Takeaways in the Rossendale Local Plan Publication Presubmission document and its targeted approach, focussing on takeaways near schools and in areas of high obesity. We are concerned however that the wording of the current policy is open to interpretation in relation to opening times and also defining what 'would not adversely contribute to obesity'.					
We recommend that in light of the information and evidence presented in the Hot Food Takeaways and Spatial Planning Public Health Advisory Note, that Policy R5: Hot Food Takeaways is amended to reflect the following:					
1. A 400m restriction zone surrounding secondary schools					
The policy benchmark of a 400m restriction zone surrounding schools (refusing applications for all new A5 use premises or a defined restriction on A5 use opening hours within the restriction zone) has been tried and tested by an increasing numbers of local authorities at this point. This exclusion approach will help to limit secondary school children's access to unhealthy food at lunchtimes and immediately after school.					
2. R efusing new A5 uses within wards where more than 15% of year 6 pupils or 10% of reception pupils are classed as obese					
In order for policy such as this to be adopted, there must be evidence in place to demonstrate that there is a problem to be dealt with. This approach is based on targeting those neighbourhoods which have an evident problem because they sit within the top two quintiles nationally for obesity.					
Data on child excess weight and obesity at ward level is freely available through www.localhealth.org.uk and is updated every year through the National child measurement programme (which displays an indicator based on the past three years of aggregated data). North Tyneside's adopted policy (DM3.7) is a good example of this.					
3. P revent the clustering of A5 uses in deprived neighbourhoods					
Many local authorities already have policies that seek to prevent A5 clustering from the perspective of the character, function, vitality or viability of an area. However these policies are justified, they are also useful for addressing the issue of obesogenic environments.					
A good example of this kind of policy can be found in Gateshead , who have adopted policies that restrict A5 uses to just 5% of total commercial uses within an area, and allow no more than two consecutive A5 uses in any one length of frontage.					
I trust the above is of benefit to the progress of the Rossendale Local Plan - Reg 19 version: Consultation. I look forward to continuing our close work as the local plan progresses.					
Appendix 1					
Please see appendix					

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy R6 Shopfronts

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on R6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support R6.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5163 Ms** **Emily** **Hrycan** **Historic England** Number of supporters:

Commenting on R6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Section - Policy R6 Shopfronts

Comments - Suggested minor amendment, to include reference to “character and appearance” of the conservation area in line with the requirements of the 1990 Act.

Suggested Amendment - Amend the Policy to include reference to character and appearance.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy Retail Retail

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

R1 to R6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

R1 to R6

9.24 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5176 Mr****Warren****Hilton****Highways England**

Number of supporters:

Commenting on

Retail

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

It is noted that the Local Plan intends to focus retail development within defined centres, with some amendments proposed to the boundaries of town, district and local centres within the borough. Highways England has no specific comments relating to this chapter. The details of the Leisure and Tourism chapter have also been noted, and we have no specific comments. Pertinent to the safe and efficient operation of the SRN.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section

2

Chapter 4: Environment

Comments on policy ENV01
High Quality Development in the Borough

Reference **63 Dr Chris Woods** - Number of supporters:

Commenting on ENV1

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

I am writing in response to the above. First I would like to congratulate you on the wide ranging, careful and detailed analysis in the Plan and that previous consultation has been taken into account.

I would like to confine my response to Chapter 4: Environment and in particular the moorland landscape and wind turbines.

In the Draft Plan at Policy ENV1 you mention the need for landscaping as an integral part of the development, protecting existing landscape features and natural assets, habitat creation, providing open space, appropriate boundary treatments and enhancing the public realm. You also mention that is important that proposals do not increase the risk of flooding on the site or elsewhere, and have regard to the surface water drainage hierarchy.

Do you wish to participate to the Examination In Public? **No** Reasons

Reference **5018 Brian Michael Kathy Fishwick** **Rosendale Civic Trust** Number of supporters:

Commenting on ENV1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support ENV1.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5154	Mr Philip Carter	Environment Agency	Number of supporters:
Commenting on	ENV1			
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
Issue Policy ENV1 still makes no provision for enhancement of existing environmental features, as recommended in our response to the Regulation 18 consultation. Given the aims and objectives of the Defra 25 Year Environment Plan, the policy does not help to secure the enhancement of the existing environment and would not contribute to providing a net environmental gain.				
Impact The policy does not reflect the aims and ambitions of the Defra 25 Year Environment Plan.				
Solution We continue to recommend the following amendment to Policy ENV1 as follows:-				
k) Providing landscaping as an integral part of the development, protecting and enhancing existing landscape features and natural assets, habitat creation, providing open space, appropriate boundary treatments and enhancing the public realm				

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5160	The Peel Group	Number of supporters:
Commenting on	ENV1: High Quality Development in the Borough		
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer
9.25 Peel generally supports the intent of Policy ENV1. However Peel does not agree with criterion 'O' of the policy as drafted. This requires major development proposals to be subject to a Development Brief or Design Code. It is unclear what this specifically requires. It is also unclear how the Council would define 'major development proposals' in this context.			
9.26 Major proposals need to be subject to a clear design framework governing the whole site, but in many cases this can be articulated through a Design and Access Statement which forms part of a planning application. This can then be subject to a planning condition, if appropriate, requiring the component parts of the development to be delivered in accordance with this. The design code/brief can in effect be developed and approved through the development management process.			
9.27 As such, whilst Peel supports the intent of criterion o, it should be modified to be clear that there is no explicit requirement for a design brief or code to be endorsed or approved by the Council prior to a scheme progressing to a planning application.			

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5170 Mr**

Melanie

Lindsley

The Coal Authority

Number of supporters:

Commenting on

ENV1

Is the Local Plan legally compliant? **Yes**

Is the Local Plan sound? **Yes**

Does the Local Plan complies with the duty to co-operate? **Yes**

Support – The Coal Authority supports the inclusion of this policy which identifies at criteria (t) the development proposal will be expected to take account of land stability and address this issue through appropriate remediation and mitigation measures where necessary.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

ENV1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy ENV1: High Quality Development in the Borough

2.88 We support the general principles outlined in Policy ENV1, which are all important factors in delivering high quality development in the Borough.

2.89 Whilst acknowledging the important role that Development Briefs or Design Codes (point o) can play in delivering high quality development, they can sometimes add an additional administrative burden leading to delays to housing delivery. In order to overcome this, if Design Codes or Development Briefs are to be introduced, this process should involve early engagement with Developers on Masterplan concepts.

2.90 Frontloading such work will save delays down the line and provide a high quality design framework which both the Council and Developer are happy with. It should be noted, that Taylor Wimpey have already undertaken such engagement with the Council on the development proposals for the Market Street, Edenfield site.

2.91 Additionally, Design Codes can sometimes impose constraints on the sale of land to specific housebuilders, if certain standards are outlined which not every housebuilder could deliver. This is something that should be considered as part of dialogue between the Council and developers/landowners for each individual site.

2.92 The above points should be seriously considered given the Council's historic concerns with rates of under delivery, and the Council will be under pressure to have this requirement secured upon adoption of the Plan. Necessitating Development Briefs or Design Codes for each allocated site will simply push back delivery rates.

LAND WEST OF MARKET STREET, EDENFIELD

Policy ENV1: High Quality Development in the Borough

2.77 We support the general principles outlined in Policy ENV1, which are all important factors in delivering high quality development in the Borough.

2.78 Whilst acknowledging the important role that Development Briefs or Design Codes (point o) can play in delivering high quality development, they can sometimes add an additional administrative burden leading to delays to housing delivery. In order to overcome this, if Design Codes or Development Briefs are to be introduced, this process should involve early engagement with Developers on Masterplan concepts. Frontloading such work will save delays down the line and provide a high quality design framework which both the Council and Developer are happy with. It should be noted, that Taylor Wimpey have already undertaken such engagement with the Council on the development proposals for the Market Street, Edenfield site.

2.79 Additionally, Design Codes can sometimes impose constraints on the sale of land to specific House builders, if certain standards are outlined which not every housebuilder could deliver. This is something that should be considered as part of dialogue between the Council and developers/landowners for each individual site.

2.80 The above points should be seriously considered given the Council's historic concerns with rates of under-delivery, and the Council will be under pressure to have this requirement secured upon adoption of the Plan. Necessitating Development Briefs or Design Codes for each allocated site will simply push back delivery rates.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5176 Mr****Warren****Hilton****Highways England**

Number of supporters:

Commenting on

ENV1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

In addition, Highways England support the Council's requirements for new developments to demonstrate connectivity to public transport, walking and cycling networks within 'Strategic Policy ENV1: High Quality Development in the Borough'.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section

7

Comments on policy ENV02**Heritage Assets**Reference **63 Dr****Chris****Woods**

-

Number of supporters:

Commenting on

ENV2

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

Policy ENV2: The Council will support proposals which conserve or, where appropriate, enhance the historic environment of Rossendale.

Proposals affecting a heritage asset should conserve those elements which contribute to its significance. As well as fulfilling its statutory obligations, the Council will seek to identify, protect and enhance local heritage assets.

The Council are developing a local list of non-designated heritage assets which include buildings, monuments, sites, places, areas or landscapes of significance. the

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
Commenting on	ENV2				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>RCT supports ENV2 and welcomes the proposals to add, to the present nine conservation areas: Haslingden, Crawshawbooth, Helmshore and Newchurch, and to extend Chatterton Strongstry. And notes:-</p> <p>A. RCT would also hope that the Management Proposals Plans are to be developed, and where necessary, brought back to Council for specific approval for their incremental implementation as resources allow, including the re-designation of Conservation Area boundaries. THE CABINET Wednesday 26th October 2011.</p> <p>B. RCT welcome the news that the Council are developing a local list of non-designated heritage assets which include buildings, monuments, sites, places, areas or landscapes of significance. These heritage assets don't meet national standards for designation but make a significant contribution to Rossendale's landscape and merit consideration in planning decisions. The identification of heritage assets on the list plays an important role in ensuring the proper validation and recording of Rossendale's local heritage assets and in protecting the Borough's individual character and distinctiveness. Assets on the list have been carefully selected in accordance with guidance on Local Heritage Listing from Historic England.</p> <p>RCT assume that this present list stems from that produced by The Rossendale Heritage Network in 1992, noted in Rossendale District Local Plan: First Review's Public Inquiry 1994 Inspector's Report: para 2.602, and as referred to in:-</p> <p>Core Strategy DPD Consultation 16th May – 27th June 2011 Representations Received & Council's Response Published by Rossendale Borough Council Forward Planning Team July 2011</p> <p>Representation Number:19/1/1/5 ID 19: Turley Associates on behalf of NHS Trust Council's Response includes:-</p> <p>The Council believes that the building does have local significance; the countersigning adviser to the June 2008 English Heritage Adviser's report on potential Listing said of the former Workhouse that it is "clearly of interest in a local context, especially with the imposing main frontage". This was re-iterated in a DCMS letter to Jake Berry MP in 2010. The Rossendale Heritage Network Group document "Rossendale's Local List" includes this property "Rossendale General Hospital" as site ref RST 26 where it states that it is the only unlisted building in Rawtenstall that is mentioned in Pevsner. Although not formally adopted by RBC, the existence of this document suggests that properties included within it should be recognised as heritage assets according to PPS5. In addition the site and buildings are shown and referenced in the Lancashire Historic Town Survey – Historic Town Assessment Report for Haslingden dated June 2005 (cover dated July 2006). The site is therefore already a recognised heritage asset -whilst it is not "designated" it does have local significance.</p> <p>RCT note that the LPA, gave permission for demolition, after Valuation Office Agency Report. The VOA noted that the LPA wished to retain the building, but it supported the viability of the applicant's development options for the site. It included an extract from NPPF's clause 173, and noted that, in the absence of listed building or other protection, the NPPF, in effect, supported both applicants and landowners aims to get best profit and return from their projects and land disposals.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

ENV2: Heritage Assets

9.28 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5163 Ms****Emily****Hrycan****Historic England**

Number of supporters:

Commenting on

ENV2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Section - Policy ENV2: Heritage Assets

Comments - Historic England support Policy ENV2. With reference to the comments on page 10 of the Plan, the title should read “historic environment” as the policy covers this and is referenced in line one of the policy.

Suggested Amendment - Amend title to read “Historic Environment”.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

ENV2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy ENV2: Heritage Assets

2.93 We have no comments on this policy other than the supporting text to the policy confirming that the Council are developing a local list of non-designated heritage assets. We politely request that the list is well publicised, in order for interested parties to monitor listed sites that affect them.

LAND WEST OF MARKET STREET, EDENFIELD

Policy ENV2: Heritage Assets

2.81 We have no comments on this policy other than the supporting text to the policy confirming that the Council are developing a local list of non-designated heritage assets. We politely request that the list is well publicised, in order for interested parties to monitor listed sites that affect them.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Conservation area boundaries

Reference	116 Mr	John	Simpson	Helmshore Local History Society	Number of supporters:
Commenting on	-	-	-	-	Conservation area boundaries
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Yes

We welcome the proposed new conservation areas in Haslingden and Helmshore but believe their boundaries should be extended to include more of the area's heritage.

Haslingden - its southern boundary should be moved to include Haslingden baths. Helmshore - its south-eastern boundary should be moved to include the former Bridge End public house (now the Cotton Shed), Bridge End bridge, Sunnybank Social Club; Helmshore Memorial Gardens (sometime erroneously referred to as Snig Hole Park), including its entrance gateposts, and the cottages at Snig Hole (which are Listed). Its south-western boundary should be extended to include more of Holcombe Road and the cottages at Woodbank.

Do you wish to participate to the Examination In Public? **No** Reasons -

Proposed Conservation Area

Reference	92 Miss	Janet	Simpson	-	Number of supporters:
Commenting on	-	-	-	-	Proposed Conservation Area
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer

Whilst I welcome the creation of a Conservation Area in Helmshore the proposed boundary does not effectively and fully represent remaining links with the village's industrial heritage and should be extended.

Strategic Policy ENV2: Heritage Assets

To make the Local Plan sound and effective in terms of the Helmshore Conservation Area the proposed boundary should be extended in a south-easterly direction to include the former Bridge End pub, The Sunny Bank (formerly known as Sunny Bank Social Club), Helmshore Memorial Park and playground and Snig Hole Cottages. These buildings and area have links with the former local textile industry, local mill owners and workers, which should be recognised. The buildings and area should be granted the same status and protection as those in the area proposed in the Policies Map (Pre-Submission Publication Version).

Do you wish to participate to the Examination In Public? **No** Reasons -

The Former Regal Cinema

Reference **5192**

B&E Boys Ltd

Number of supporters:

Commenting on

The Former Regal Cinema

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

5.3 As demonstrated in this Representation the subject site is not suitable for retention or conversion. The building is in a deteriorating state and is not fit for commercial purposes, and certainly not for the current D2 (Assembly and Leisure) use. The site is empty and unused, and this has been the situation for more than four decades. It's inclusion within the Town Centre is a reflection of its location; it makes no contribution whatsoever to the retail offer. As it stands at the moment, there is no prospect of this position improving. It is our view that Policy ENV2 has not been positively prepared as it should make explicit reference to the demolition of the existing building to facilitate redevelopment of the site for uses appropriate in a Town Centre for the reasons set out in this detailed Representation. On this basis alone, the Council's Pan is unsound.

5.4 In this regard, the site should be allocated for retail, to positively reflect the aims of Strategic Policy R1 and Policy R3 as discussed in this Representation.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 8

Comments on policy ENV03 Landscape Character and Quality

Reference **63 Dr**

Chris

Woods

-

Number of supporters:

Commenting on

ENV3

Is the Local Plan legally compliant? **Yes**

Is the Local Plan sound? **Yes**

Does the Local Plan complies with the duty to co-operate? **Yes**

Policy ENV3: The Council will expect development proposals to conserve and, where possible, enhance the natural and built environment, its immediate and wider environment and take opportunities for improving the distinctive qualities of the area and the way it functions and not to have an unacceptable impact on skylines and roofscapes.

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
Commenting on	ENV3				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>RCT support ENV3 and welcome how the Council has commissioned various consultants to better understand Rossendale’s valuable landscape and to investigate the potential effects of development. The Council together with neighbouring local authorities commissioned Julie Martin Associates to undertake a study⁵ to investigate the potential effects of wind energy development on the character and quality of the landscapes of Rossendale and the wider South Pennines area.</p> <p>More recently, the Council commissioned Penny Bennett Architects to develop this approach into a broader application to all development. This Study recommends that development should not generally take place within enclosed upland or moorland fringe landscape character types, identifies the importance of green infrastructure such as native screen planting and the need for development to retain key views to important landmarks.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference	5160	The Peel Group	Number of supporters:
Commenting on	ENV3		
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer
<p>Does the Local Plan complies with the duty to co-operate? Did not answer</p> <p>ENV3: Landscape character and quality</p> <p>9.29 This policy seeks to ‘protect and enhance’ the distinctive landscape character of the Borough. It sets out the expectation that development proposals ‘conserve and where possible enhance’ the natural and built environment.</p> <p>9.30 The landscape character and quality of Rossendale is a key consideration in the determination of planning applications and should inform the design approach to sites. However, it will be necessary for some level of impact on this to be permitted in order for the Local Plan’s development requirements to be met. The policy should recognise this. Minimisation of harm and incorporation measures into schemes to achieve this should be supported but impacts cannot be eradicated entirely. The objective of the policy should be to reduce and manage these impacts as must as practicably possible.</p> <p>9.31 The first two paragraphs of the policy should be amended to read as follows:</p> <p>The distinctive landscape character of Rossendale, including large scale sweeping moorlands, pastures enclosed by dry stone walls and stone built settlements contained in narrow valleys will be protected and enhanced where possible</p> <p>The Council will expect development proposals to, where possible, conserve and enhance, the natural built environment, its immediate and wider environment and take opportunities for improving the distinctive qualities of the area and the way it functions.</p>			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons	

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

ENV3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy ENV3: Landscape Character and Quality

2.94 We are generally supportive of this policy, as it broadly aligns with national policy, however to increase flexibility we would recommend adding the following wording, before the list of landscape requirements:

“in order to protect and enhance the character and quality of the landscape, development proposals should, where possible:”

LAND WEST OF MARKET STREET, EDENFIELD

Policy ENV3: Landscape Character and Quality

2.82 We are generally supportive of this policy, as it broadly aligns with national policy, however to increase flexibility we would recommend adding the following wording, before the list of landscape requirements:

“in order to protect and enhance the character and quality of the landscape, development proposals should, where possible:”

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 4

Comments on policy ENV04**Biodiversity, Geodiversity and Ecological Networks**Reference **63 Dr****Chris****Woods**

-

Number of supporters:

Commenting on

ENV4

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

Policy ENV4: Any development that adversely affects or damages a Site of Special Scientific Interest (SSSI) will not normally be granted permission.

Do you wish to participate to the Examination In Public? **No** Reasons

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on ENV4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support ENV4.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5157 Ms** **Joanne** **Harding** **Home Builders Federation** Number of supporters:

Commenting on ENV4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV4: Biodiversity, Geodiversity and Ecological Networks

Policy ENV4 is not considered to be sound as it is not effective for the following reasons:

This policy requires provision of, or contributions to the creation of, Sites of Suitable Alternative Natural Green Space (SANGS) where a development would have an individual or cumulative impact on Priority Species. The HBF do not oppose the provision of SANGS but do not consider that the provision of SANGS should hinder the deliverability and viability of sustainable development when there may be more effective options that could be explored in discussion with Natural England.

HBF propose that the policy is modified as follows:

- Provision of, or contributions to creation of, Sites of Suitable Alternative Natural Green Space (SANGS) will be sought Where development would have an individual or cumulative impact on Priority Species resident in or making use of habitat in the Borough, developers will be expected to explore effective, viable options for their protection with the Council and Natural England, potentially including the provision or, or contributions to the creation of, Sites of Suitable Alternative Natural Green Space (SANGS)'.

Do you wish to participate to the Examination In Public? **Yes** Reasons

Reference **5160** **The Peel Group** Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV4: Biodiversity, Geodiversity and Ecological Networks

9.32 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5172 Mr Alex Rowe Natural England** Number of supporters:

Commenting on ENV4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV4: Biodiversity, Geodiversity and Ecological Networks

Natural England welcomes the above policy wording, especially how the plan clearly demonstrates how development must first avoid, mitigate and as a last resort compensate for adverse impacts on biodiversity. The plan's policy wording explains how development, which has the potential to adversely affect or damage a Site of Special Scientific Interest (SSSI) will not normally be granted permission that is welcomed.

Net gain is discussed in the Draft Local Plan Policy ENV4 as an outcome of compensation, which is not consistent with the NPPF. Natural England would like to see additional wording added to this policy that makes it clear that the Local Plan seeks to achieve a net gain in biodiversity. The NPPF (para 174) states: "To protect and enhance biodiversity and geodiversity, plans should:...promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.". In consideration of the above, Policy ENV4 of the Local Plan does not fully encompass the NPPF's principles for a net gain policy, rather the currently policy only seeks to implement a net gain approach at the compensation stage.

We welcome the Ecological Networks that have been identified in the Local Plan Policies Map, as well as the designated ecological areas referred to as "Greenlands". Natural England welcomes the above policy wording in the Local Plan and specifically the opportunities for enhancement, as well as the specific comments relating to Ecological Networks. On this point, we would like to see details of specific habitat types that would be most appropriate for enhancement, placing the emphasis on increase size, quality and quantity of priority habitats within cores areas, corridors or stepping stones that improves connectivity for habitats and movement of species. The SPD that will set out in detail the specific elements and role of Ecological Networks is welcome and is a document Natural England would like to be consulted upon, at the earliest possible stage.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

ENV4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy ENV4: Biodiversity, Geodiversity and Ecological Networks

2.95 This policy requires provision of, or contributions to the creation of, Sites of Suitable Alternative Natural Green Space (SANGS) where a development would have an individual or cumulative impact on Priority Species.

2.96 However, the requirement for SANGS, and its impact on viability has not been properly justified or evidenced in the plan at this stage and as such we would ask for urgent clarification on this matter.

2.97 Furthermore, if the requirement for SANGs is justified, it is clear that its provision should not hinder deliverability and viability of sustainable development when there may be more effective options that could be explored in discussion with Natural England. As such we would endorse the HBFs proposed wording for this section, which is as follows: "Where development would have an individual or cumulative impact on Priority Species resident in or making use of habitat in the Borough, developers will be expected to explore effective, viable options for their protection with the Council and Natural England, potentially including the provision or, or contributions to the creation of, Sites of Suitable Alternative Natural Green Space (SANGS)."

2.98 Finally, we note that the supporting text to this policy and Habitat Regulation Assessment (prepared by Lepus consulting) requires all developments over 100 dwellings to provide an 'Appropriate Assessment' in line with Habitat Assessment Regulations; however we cannot find any justification for this 100 unit threshold within the plan, HRA or the regulations, and would ask for clarification on this point.

LAND WEST OF MARKET STREET, EDENFIELD

Policy ENV4: Biodiversity, Geodiversity and Ecological Networks

2.83 This policy requires provision of, or contributions to the creation of, Sites of Suitable Alternative Natural Green Space (SANGS) where a development would have an individual or cumulative impact on Priority Species.

2.84 However, the requirement for SANGS, and its impact on viability has not been properly justified or evidenced in the plan at this stage and as such we would ask for urgent clarification on this matter.

2.85 Furthermore, if the requirement for SANGs is justified, it is clear that its provision should not hinder deliverability and viability of sustainable development when there may be more effective options that could be explored in discussion with Natural England. As such we would endorse the HBFs proposed wording for this section, which is as follows: "Where development would have an individual or cumulative impact on Priority Species resident in or making use of habitat in the Borough, developers will be expected to explore effective, viable options for their protection with the Council and Natural England, potentially including the provision or, or contributions to the creation of, Sites of Suitable Alternative Natural Green Space (SANGS)."

2.86 Finally, we note that the supporting text to this policy and Habitat Regulation Assessment (prepared by Lepus consulting) requires all developments over 100 dwellings to provide an 'Appropriate Assessment' in line with Habitat Assessment Regulations; however we cannot find any justification for this 100 unit threshold within the plan, HRA or the regulations, and would ask for clarification on this point.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section

6

Comments on policy	ENV05	Green Infrastructure networks
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Reference	2 Mr	John	Lamb	Lancashire Wildlife Trust Ltd.	Number of supporters:
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Commenting on	-	ENV5
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
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This policy could be stronger, providing better protection for designated wildlife sites. It should be clearer that development must not adversely affect wildlife sites except in specific circumstances .Whilst there is good reference to Ecological Networks it is not proactive in identifying the weak links in the network and areas where opportunities need to be taken to strengthen it. The Local Plan should identify those areas where the network needs strengthening. The NPPF requires development to deliver net gains in nature. Opportunities should be taken to enhance sites, habitats, species populations and/or ecological networks that sites proposed for development lie within or adjacent to.

Provide clearer and stronger protection for designated wildlife sites. It should be clearer that development must not adversely affect important wildlife sites except in specific circumstances.The Local Plan should be proactive in identifying weak links in the Ecological Networks and identify those areas where the networks need strengthening.

Requirement for development to deliver net gains in nature. Opportunities should be taken to enhance sites, habitats, species populations and/or ecological networks that sites proposed for development lie within or adjacent to.

Do you wish to participate to the Examination In Public?	No	Reasons	-
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Reference	63 Dr	Chris	Woods	-	Number of supporters:
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Commenting on	ENV5
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Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate?	Yes
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Policy ENV5: With respect to Green Infrastructure networks, development proposals will be expected to support the protection, management, enhancement and connection of the green infrastructure network. It is a key component in the areas “environmental capital” and has an important role in providing habitats and migratory routes for many plants and animals, as well as reducing flood risk through initiatives such as Natural Flood Management. It also has significant social benefits, contributing to increased health and well-being, especially in more deprived areas. This includes protecting Rossendale’s Public Right of Way network, which is one of the densest networks in the country, but also one which is generally in a poor state of repair.

Do you wish to participate to the Examination In Public?	No	Reasons
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Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

ENV5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support ENV5 provided that it is amended to include Greenlands and a commitment to consult with Natural England where the acquisition and creation of Green Infrastructure/Greenland has been grant funded by them, as successor to the Countryside Commission, following their involvement in the creation of Rossendale Groundwork Trust in 1983.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5120 Mr****Peter****Wilmers**

Number of supporters:

Commenting on

ENV5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Although the agreed NW definition of Green Infrastructure is used, I can see no evidence of an underpinning analysis of the different functions performed by Rossendale's Green Infrastructure (GI) and how this can be enhanced. The plan seems to see GI as something primarily rural, whereas it is universal, and there should be policies both protecting the most important parts (not identified so far as I can see) and requiring new development to enhance GI (eg with Swales, green engineering to enhance flood protection and reabsorption of rain water (vital with Rossendale's steep sided valleys) green rooves, tree screens to reduce noise, visual intrusion and to enhance air quality, etc. The Council seem to have employed various consultants. The Mersey Forest have developed very economic techniques to map GI and identify which parts provide the greatest benefits in term of multinationality. I suggest they be retained to undertake a proper analysis of Rossendale's GI and how the benefits of this could be maximised, with sensible policies.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV5: Green Infrastructure networks

9.33 Policy ENV5 seeks to protect the Borough's 'green infrastructure' from inappropriate development. Green infrastructure is a catch all term applied to a variety of open land in the Borough according to its environmental quality and contribution. The development potential of green infrastructure will vary according to its green infrastructure function and contribution. For example, some such land may be a wildlife corridor for local wildlife but it otherwise not accessible or does not contain and habitats of specific importance.

9.34 As drafted, the policy would prevent the development of green infrastructure sites unless either replacement provision is achieved; and the proposal would not have an unacceptable impact on amenity, surface water run off, nature conservation or the integrity of the green infrastructure network.

9.35 Peel does not agree that both of these criteria need to be satisfied. If the second criteria is met (essentially that the green infrastructure function and contribution of the site is not undermined through the development proposal) then there should be no requirement to satisfy the first criteria (namely re-provision).

9.36 This defect in the policy is rectified by the substitution of 'and' with 'or' between the first and second criteria as listed.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5172 Mr****Alex****Rowe****Natural England**

Number of supporters:

Commenting on

ENV5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV5: Green Infrastructure networks

We welcome Policy ENV5 that seeks to protect and enhance the green infrastructure network. For clarity and consistency, Natural England recommends that the NPPF definition of Green

Infrastructure is referred to and acknowledged in the document that should form the basis of discussions regarding Green Infrastructure policies in the Local Plan for Rossendale.

Green Infrastructure is defined by the NPPF as "a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities." (NPPF page 67).

We also refer to the National Planning Policy Guidance (NPPG) (paragraph 027) for further clarity: <http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/green-infrastructure/>

The Natural England definition could also be used to give a wider interpretation of Green Infrastructure that can be found using the following link:

<http://publications.naturalengland.org.uk/publication/35033>

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

ENV5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy ENV5: Green Infrastructure networks

2.99 We have no general comments to make on this policy, other than that the Grane Village allocation (H74) will ensure that the development effectively integrates with and protects the designated Green Infrastructure to the south of the site, and the open countryside to the west, and providing such linkages has been a key consideration in the masterplanning for the development.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5174****Winfields Holdings Ltd and Winfields Ltd**

Number of supporters:

Commenting on

Policy ENV5: Green Infrastructure

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The Local Authority have identified Green Infrastructure on the basis of multi-functional greenspace within urban and rural areas which is capable of delivering a wide range of environmental and health benefits for Local Communities. The land seemingly identified as part of the Regulation 19 Policies Map is extensive and incorporates developed and previously developed land, including built form, hard surfacing and private land that is not available to the community and has no obvious environmental, social or health value. The land identified also doesn't conform with the green infrastructure identified on the Regulation 18 Policies Map from 2017. It is unclear whether this is a drafting or interpretative error, but it is something that needs to be reviewed and clarified in order to meet the policy aspirations, not least as it potentially constrains the development of sites identified for residential, employment or mixed use purposes unnecessarily (impacting upon the ambition of achieving the redevelopment of brownfield sites ahead of greenfield land).

Review designation to conform with Regulation 18 Policies Map.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section 8

Comments on policy ENV06**Environmental Protection**

Reference **63 Dr Chris Woods** - Number of supporters:

Commenting on ENV6

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

Policy ENV6: Development will not be permitted if the risk of pollution cannot be prevented or if mitigation cannot be provided to an appropriate standard with an acceptable design. New development should be appropriate for its location and should not result in soil, air, water, noise pollution or land instability which has unacceptable impacts on health, amenity and biodiversity. Adverse impacts on health and quality of life arising from noise should be mitigated and reduced

Do you wish to participate to the Examination In Public? **No** Reasons

Reference **5018 Brian Michael Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on ENV6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support ENV6.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5157 Ms Joanne Harding** **Home Builders Federation** Number of supporters:

Commenting on ENV6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV6: Environmental Protection

Policy ENV6 is not considered to be sound as it is not effective for the following reasons:

This policy expects all new housing developments to provide electric charging points, unless exceptional circumstances can be demonstrated. Whilst the HBF do not oppose the provision of electric charging points, the policy as worded is currently considered to be overly onerous. An element of flexibility would be beneficial and is considered to make the policy compliant with the NPPF, paragraph 35.

☒

HBF propose that the policy is modified as follows:

- ☒ Provision of electric charging points will be expected on all new housing developments, where practical unless exceptional circumstances can be demonstrated.'

Do you wish to participate to the Examination In Public? **Yes** Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV6: Environmental Protection

9.37 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 4

Comments on policy ENV07 Wind TurbinesReference **2 Mr****John****Lamb****Lancashire Wildlife Trust Ltd.**

Number of supporters:

Commenting on - ENV7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Whilst ENV7 focusses on the impact on peat, which is understandable, the policy could be stronger in terms of avoiding / minimizing impacts on recognised wildlife sites, other habitat types and notable species, not just statutorily protected species. The Construction Management Plan should include impacts on wildlife / habitats during construction, but also include restoration of habitats upon the windfarm being decommissioned and the turbines and other infrastructure being removed.

ENV7 should specify the need to avoid / minimise impacts on recognised wildlife sites, other habitat types and notable species including statutorily protected species. The Construction Management Plan should include impacts on wildlife / habitats during construction, but also include restoration of habitats when the windfarm is being decommissioned and the turbines and other infrastructure are removed.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	63 Dr	Chris	Woods	-	Number of supporters:
Commenting on	ENV7				
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate?	Yes

Policy ENV7: Areas suitable for commercial Wind Turbines have been identified on the “Enclosed Uplands Areas” and the “High Moorland Plateau Areas.” New turbines or re-powering of existing ones may be considered provided areas of deep peat (over 40cm depth) and blanket bog are avoided. Development of new wind turbines over 25 metres in height or re-powering of existing machines outside these areas would be resisted.. Wind farms and individual turbines (including repowering of existing schemes) will only be supported if the following criteria are addressed to the satisfaction of the Local Planning Authority: • The impacts identified by the local community have been taken into account and fully addressed; The degree of openness of the landscape; The proximity to designated and non-designated built heritage assets It would not result in the loss of, or significantly detract from, key views of scenic landmarks or landscape features The proposal would not result in unacceptable visual clutter in combination with other existing structures with cumulative impacts fully assessed to the satisfaction of the Council; There would be no unacceptable harm to neighbour amenity, protected species or the use of public rights of way or bridleways; The scheme would not result in unacceptable noise impacts, including amplitude modulation, on residential properties and other sensitive users; The impact on geology, including former mine workings, peat and hydrogeology is fully appraised and issues identified addressed including restoration plans as appropriate No development is proposed on areas of peat of over 40cm depth; The proximity to distinctive landforms, such as a ridgeline, knoll or rock outcrop, which makes a key contribution to local landscape character. The proposal does not cause unacceptable harm to any heritage assets and their setting; The impact on recreational assets is assessed and impacts on key routes such as the Pennine Bridleway and Rossendale Way are avoided. A de-commissioning scheme is included

In recent years Rossendale has accommodated a considerable amount of wind energy development reflecting the high wind resource in the area. This has contributed significantly to meeting renewable energy targets. In parts of the Borough there has been cumulative visual impact, including with adjacent schemes outside Rossendale. Different heights and designs of turbine can have discordant visual effects. Other impacts include that of noise, shadow flicker and effects on hydrology. Proposals for wind farms and individual turbines need to address the criteria set out in this policy to ensure the development is acceptable. It is particularly important that in line with the Written Ministerial Statement of 2015 that the planning impacts identified by the affected local community are fully addressed and the proposal therefore has their backing. Ecological impacts, including on peat, can be significant unless the siting of the turbines is given careful consideration. Natural England considers areas of deep peat (over 40cm in depth) as particularly important and siting of turbines and supporting infrastructure on these areas should be avoided. Some areas are also valuable for nesting birds.

In summary, The Draft Plan emphasises the need to protect the existing landscape and Natural and Heritage Assets, to conserve and enhance the natural environment. to prevent developments that have an unacceptable impact on skylines and to do nothing that increases the flood risk.

There are large areas of the Borough including Enclosed Uplands and the High Moorland Plateau where large scale wind turbine development might take place. Many criteria are included which have to be met before turbine development is permitted. I believe there should be no wind farm development on the Rossendale moorland.

The Enclosed Uplands and the High Moorland Plateau contain heritage assets such as Waugh’s Well and the Cotton Famine Road which would be adversely affected by wind turbine development. Much of this moorland is blanket bog with deep peat and as such is unsuitable. These areas are important for recreation and wellbeing and it is difficult to see how wind turbine development there will improve the health and wellbeing of residents particularly those from more deprived areas.

Turbine development in these areas would result in unacceptable visual clutter in combination with other existing structures and would have an unacceptable impact on footpaths and bridle ways such as the Mary Towneley Loop.

Reference	5018	Brian Michael	Kathy Fishwick	Rosendale Civic Trust	Number of supporters:
Commenting on		ENV7			
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
RCT objects to parts of ENV7:-					
A. To Areas of Search as shown on the Policies Map, and note evidence base is: The Landscape Capacity Study for Wind Energy Developments in the South Pennines by Julie Martin Associates (JMA2010), its map for Rosendale should be added or linked to the Policy Map and should be brought, up to date, to now include and clearly mark, as well as the present Scout Moor and other Wind Turbines, those that were refused -1, and those that were approved -2, by the Secretary of State's decisions in 2017 on Scout Moor:-					
1. the proposed turbines sited near to the edge of the moor would have a significant adverse effect on the landscape character and visual amenity.would result in significant adverse visual effects and would harm the appearance of the area for local receptors to the north and west of Scout Moor.					
2. the proposal would be largely contained within the footprint of the existing wind farm and would have a negligible effect on the local landscape..... would integrate well with the existing wind farm and would have a localised visual effect of minor significance.					
It should also locate important open view areas, such as to west of Burnley Road, Loveclough, that have been included in Local Plans and supported at Planning Appeals.					
B. To no provision to secure compatibility with developing Local Plans and Spatial Frameworks of adjoining areas: how larger turbines are visible for the greatest distance; RCT note:-					
October 2016 First Draft Greater Manchester Spatial Framework, in its 242 pages, is silent on renewable and other energy sources: solar, shale, nuclear, wind, hydro, biomass, or even district heating in GM15 Carbon Emissions. A Second Draft is expected in 2018.					
GMSF's 2015 Background Infrastructure and Environment section on Carbon Emissions: 16.5 In the case of wind turbines, national planning guidance directs that "a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan. Wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient". The question for the GMSF is therefore (a) is there sufficient potential for renewable energy generation in Greater Manchester (b) should this be within the scope of the GMSF and (c) is the available evidence sufficient?					
GMSF's Background Paper Greater Manchester Spatial Energy Plan 2016 Evidence Base Study: While technical potential can be identified there are considerable challenges in getting new onshore wind projects through the planning system which is likely to be constrained by the current policy position (DCLG, 2015)** A recent series of studies carried out for GM (JBA Consulting, 2014) identified a number of potential sites for wind turbines across 6 of the districts in GM.....Across the 6 districts a total of 60MW of potential wind resource has been identified (JBA Consulting, 2014). Using the output factor from existing wind in the GM area this could provide 141GWh per year. This is 1.1 % of the total 2015 electricity consumption in GM. There are large wind sites within Greater Manchester (Scout Moor), but the electricity and carbon savings are not attributed to GM but to neighbouring counties.					
C. RCT notes from **Written Ministerial Statement on Wind Energy Development (June 2015): In applying these new considerations, suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines, or similar, will not be sufficient. Whether a proposal has the backing of the affected local community is a planning judgement for the local planning authority.					
D. RCT while welcoming the policy's safeguards, objects to a presumption to support individual turbines without taking account of their "cumulative" affects: the impact of a large number of single turbines over a wide area could be far worse than a small group. Overall, there is a need to acknowledge that by appearing to be accommodating of turbines, Rosendale Borough Council is opening itself up to more possible Appeals and Inquiries which are time, energy and financially draining. The Council should, in its policy, make clear that applications for ALL turbines MUST go through a public assessment process and that notice will be taken of the results of that process. Recent experience should inform this policy.					

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5147 Mr Tom Whitehead** Number of supporters: 16

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Please accept this as a representation to the Publication (pre-submission) Version of the Local Plan; this representation follows on from a previous representation dated 9 October 2017.

This representation is on behalf of a collective of individuals and community groups who came together to resist the Scout Moor Windfarm extension proposals (Rossendale), and the Rooley Moor Windfarm

proposals (Rochdale) over the course of the last three years or so.

The group's serious concerns towards the draft Rossendale Local Plan policies pertaining to wind turbine development remain, despite our well-founded and considered representations to the previous draft.

LPA'S RESPONSE TO PREVIOUS REPRESENTATIONS

We are disappointed to note that the LPA has chosen not to provide comment or response to representations made to earlier iterations of the plan. We can only make the following comments by inference therefore.

We are pleased to note that it appears that the four policies in the previous iteration of the plan (the then ENV4, ENV8, ENV9 and ENV10) which referred to and ostensibly supported wind turbine development

have been reduced down to just one policy (the new ENV7) following our representations; we comment on ENV7 below, but highlight the LPNs evident willingness to promote a pro-turbine Local Plan: even to

the extent that earlier drafts of the Local Plan clearly made superfluous policy provision for pro-turbine development.

We presented evidence to the Scout Moor Call-in Inquiry to demonstrate Rossendale council's financial reliance on developing wind turbines on its landholdings on Scout Moor (deriving rental income from Peel Holdings' aspirations to extend the current wind farm); evidence included public statements from the council's chief financial officer, recorded on council minutes, imploring members to support the development of turbines as a source of income. We will again make this evidence available to the Local Plan hearings.

Whilst this is not strictly a planning matter per se, we fear that this, and the over-exuberant use of pro-turbine policies in the previous draft Local Plan, illustrate an LPA seemingly motivated by financial return, rather than sound planning. There would also appear to be a serious lack of democratic judgment, given the officer's report to the Scout Moor proposals recorded that 97% of consultation responses to the proposals were objections (including the area's MP, who organised a petition).

DRAFT POLICY ENV7

The majority of new wording of draft policy ENV7 is unclear and extensively contradictory: as drafted the policy is wholly inadequate. We would make the following observations as an example:

- Use of the phrase 'community led' is evidently unclear: does the community include the pro-turbine council, a local developer and owner of the existing wind farm such as Peel Holdings, or a farmer looking to expand existing turbine development on his land?
- The areas of search include areas where the Secretary of State refused proposals in 2017 for additional turbines on Scout Moor, citing landscape impact as the reason for refusal. The council's evidence base relies on an out of date (2014) council-commissioned landscape study, which pre-dates the development of many new turbines locally, and the Secretary of State's recent (2017) decision. The council's position is completely untenable. The Areas of Search should be deleted.
- Policy states that turbines outside of the Areas of Search would be resisted; which flies contrary to other parts of the policy which state "Community led proposals for wind turbines in all parts of the Borough will be supported"; this is unclear, and inadequate as policy.
- There is extensive and seemingly contradictory commentary on what will and will not be allowed in terms of turbine height.

Requested Modifications

We suggest that the areas of search should be deleted in their entirety. If the LPA can justify a need for them, then they should exclude Scout Moor, given the Secretary of State's findings.

We broadly support the list of criteria set out at the end of draft policy ENV7, which we replicate at the foot of this representation. Indeed, it would appear that this wording should suffice as the Local Plan

turbine policy, without the policy text that precedes it. As such, policy ENV7 needs a re-draft along the lines of the text at the foot of this representation.

We would suggest the addition of the following text to the criteria to ENV7:

"the turbines and associated infrastructure should avoid areas of blanket bog" as referred to elsewhere in the current draft ENV7.

"and a commitment to funding the entire decommissioning of the turbine and all associated infrastructure",

Yours sincerely,

Signed on behalf of:

- Rooley Moor Neighbourhood Forum
- Holcombe Society
- Bury Rural Inequalities Forum
- Ramsbottom Heritage Society
- Prickshaw & Broadley Fold Area Community Group
- Rossendale Harriers club
- Friends of Rooley Moor
- Whitworth Residents
- Turn Village Residents
- Townsend Fold Residents
- Affetside Society
- Lane Head residents group
- Edenfield Village Residents Association
- Rochdale & Bury Bridleways Association committee
- Rural Rossendale Trust Accommodation Providers
- Norden Area Forum

Follows ...

Proposed text for ENV7 (taken from current draft ENV7)

"Proposals for commercial wind farms and individual turbines (including repowering of existing schemes) within Areas of Search shown on the Policies Map will only be supported if the following criteria are addressed to the satisfaction of the Local Planning Authority:

- The impacts identified by the local community have been taken into account and fully addressed;
- The scale, height and siting of the turbine(s) and all supporting information is appropriate to the area taking into account:
 - o The vertical height and horizontal expanse of the topography;
 - o The degree of openness of the landscape;
 - o The scale of adjacent landscape features, buildings and walls;
 - o The proximity to designated and non-designated built heritage assets;
 - o The proximity to distinctive landforms, such as a ridge line, knoll or rock outcrop, which makes a key contribution to local landscape character;

- o The presence of existing settlement or field patterns; and
 - o The opportunities to screen or reduce the visual impact of the development;
 - It would not result in the loss of, or significantly detract from, key views of scenic landmarks or landscape features;
 - The design, colour, layout and arrangement of turbines are appropriate to their setting;
 - The proposal would not result in unacceptable visual clutter in combination with other existing structures with cumulative impacts fully assessed to the satisfaction of the Council;
 - There would be no unacceptable harm to neighbour amenity, protected species or the use of public rights of way or bridleways or a severe impact on highway safety;
 - Shadow and Reflective Flicker impacts on buildings and Public Rights of Way are fully assessed with a precautionary approach taken to mitigation;
 - The scheme would not result in unacceptable noise impacts, including amplitude modulation, on residential properties and other sensitive users;
 - The impact on geology, including former mine workings, peat and hydrogeology is fully appraised and issues identified addressed including restoration plans as appropriate;
 - No development is proposed on areas of peat of over 40cm depth;
 - Impacts on designated species and ecological assets are avoided or minimised;
 - The proposal does not cause unacceptable harm to any heritage assets and their setting;
 - The impact on recreational assets is assessed and impacts on key routes such as the Pennine Bridleway and Rossendale Way are avoided or if this is not possible, mitigated;
 - The scale, siting and design of any ancillary structures and access tracks are appropriate to the character of the area and the landscape setting;
 - The submission contains a Construction Management Plan, including impacts on the Highway network, and incorporates proposals for managing the de-commissioning and removal of the turbines and the restoration of the site;
 - Any landscape features removed or altered to enable the erection of the turbine are reinstated and the design, materials and scale of any new fencing or walling needed is appropriate to the character of the local area;
 - Issues with respect to the following are appropriately addressed to the satisfaction of the Local Planning Authority:
 - o Shadow and reflective flicker
 - o TV and phone reception
 - o Air traffic radar reception; and
 - A de-commissioning scheme is included.
- Adding:
- the turbines and associated infrastructure should avoid areas of blanket bog; applications affective these areas in any way shall be refused.
 - a robust commitment to funding the entire decommissioning of the turbine and all associated infrastructure upon expiry of the planning permission

Representation made in October 2017 (attached to the above representation):

REPRESENTATION TO THE ROSSENDALE LOCAL PLAN, DATED 9 OCTOBER 2017

Please accept this representation on behalf of a collective of individuals and community groups who came together to resist the Scout Moor Windfarm extension proposals (Rossendale), and the Rooley Moor Windfarm proposals (Rochdale).

Following these two successful campaigns, as well as campaigns against other individual turbine proposals locally, the group's purpose has evolved and now includes resisting inappropriate wind turbine development in the wider north-Manchester uplands, including land in Rossendale, Bury, Rochdale and Blackburn with Darwen.

The group has serious concerns as to the draft Rossendale Local Plan policies pertaining to wind turbine development, and these are elaborated on below. Requests to amend policy are highlighted blue for ease of reference.

A schedule of the signatories to this submission is set out at the foot of this representation.

REGIONAL IMPORTANCE OF THE 'UPLANDS' By way of a context, the October 2016 draft Greater Manchester Spatial Framework (GMSF) identifies "the north Manchester uplands" as a regionally important landscape, for the benefit and utility of people from the wider city region (Policy GM10). The uplands provide a valuable visual, environmental and recreational resource to the region, and are precious in their very 'open-ness'.

Whilst Rossendale is not within Greater Manchester, its administrative area lies intimately between and around the GM authorities of Bury and Rochdale, and the moorland and upland in Rossendale's south-western sector (notably Scout Moor and the moorlands north and east of Ramsbottom) function inescapably as part of this greatly valued Greater Manchester regional upland resource. To demonstrate this regional importance, the draft GMSF policy said:

"The distinctive upland landscape, including large scale sweeping moorlands, pastures enclosed by dry stone walls, and gritstone settlements contained in narrow valleys, will be protected and enhanced as part of the wider Pennine area extending to the north and east of Greater Manchester.

The achievement of the following priorities will be particularly important:

1. Significantly extend the area of active blanket bog, both through the protection of existing sites and the restoration of degraded areas, thereby helping to retain and capture carbon, support priority species and habitats, improve water quality, retain water, manage run-off and reduce soil erosion;
2. Enhance the full range of moorland habitats as part of an ecologically connected network, including improving upland meadows, to support increased wildlife populations and enable them to adapt to climate change;
3. Maintain the sense of remoteness, protect historic landscape features, and enhance views of and from the area, as key aspects of local distinctiveness, tranquillity and identity;
4. Enhance public access and promote the enjoyment of the landscape, in a manner compatible with conserving the environmental and historic qualities, thereby supporting a high quality of life, healthy lifestyles and the attractiveness of Greater Manchester for visitors."

Whilst in draft, this policy was included in the GMSF from the outset, and clearly demonstrates a recognition at the GM level the value of these uplands. This position reflects the position of Natural England, who identify this area as within the South Pennine Character Area.

Given this regional significance, the north Manchester uplands are to be read as one collective of spaces, despite the considerable expanse of area they occupy, and despite straddling various different local authority administrative areas.

LOCAL PRECEDENT & LANDSCAPE VALUE The decisions of three recent planning applications for turbines or groups of turbines within this GM uplands area have been taken at either Secretary of State or Planning Inspectorate level. We identify these decisions below, and in each instance, summarise the reason for refusal: 1. Scout Moor Windfarm Extension (DCLG reference APP/B2355/V/15/3139740; refused at SoS call-in; decision dated 6 July 2017); the proposed development would be visible from Ramsbottom and surrounding Bury settlements. The SoS observed that "the proposal sits within an area of valued landscape because of its openness, tranquillity and attractive views", and "would introduce prominent views of turbines where none currently exist"; in concluding, the Secretary of State factors in to the planning balance the energy-generation benefits of the proposal, and yet concludes in "weighing the benefits of the scheme against the likely harm...the planning balance falls against granting planning permission". The SoS also gave considerable weight to the level of opposition expressed by 'Affected Communities' (a term introduced by the June 2015 Written Ministerial Statement for onshore turbine development). 2. Rooley Moor Windfarm, Rochdale; reference 14/00877/FUL, determined 25 June 2015. Reasons for refusal included "Rooley Moor is specifically identified as 'unenclosed moorland' with a wild and tranquil landscape character. The proposed development of twelve turbines would have a detrimental impact on the landscape character of the area, from both short range and longer distance views and both individually and cumulatively when viewed with existing and proposed wind farm developments in the area."

3. Turbine at Gatehouse Farm, Bamford Road, Ramsbottom (Turn Village), Bury, BLO 0RT; appeal reference: APP/B2355/W/16/3152975, dated 29 November 2016. The inspector found that 'the totality of harm would not be outweighed by the environmental benefits'. It is clear that, despite claimed energy-generation benefits of turbine development, the adverse landscape impacts of such developments across this north-Manchester upland area clearly outweigh any claimed benefits. Given the regional significance of the north-Manchester uplands, these recent decisions give considerable weight towards the policy commentary set out below.

POLICY PROPOSALS & COMMENTS
Draft Policy SD2

The Green Belt boundary should be extended in the area south of Rawtenstall to meet the southern boundary of Rossendale's borough boundary.

This would assist in protecting against 'urban sprawl' (wind turbines and ancillary development being urbanising), to assist in safeguarding the countryside from encroachment, and to protect the character and setting of historic towns. These are of course three of the five purposes of Green Belt as defined in NPPF; there is therefore a compelling case for this.

At the time the current Green Belt boundaries were set previously, it would have been inconceivable for the threat of windfarm development of the scale now present and threatened. There is a compelling need to update policy and land allocations to reflect modern challenges.

Draft Policy ENV4

We object in the strongest terms to draft policy ENV4 as presently worded.

The policy wording in itself recognises the value of the landscape, and is to be commended. However, the supporting text (which forms a functional role in interpreting the policy) and the illustration at 'Figure 1' are seriously flawed.

The decision of the Secretary of State on the Scout Moor extension proposals, clearly demonstrates that a tipping point has been reached where the landscape along the M66 corridor can no-longer accommodate additional turbines. The Julie Martin study referred to dates back to 2014, is out of date, and has been discredited through the Scout Moor call-in process. Indeed, the council's own landscape consultee to that planning application (as recorded in the officer's report to committee) recommended that the landscape impacts of additional turbines would be unacceptable.

Given policies elsewhere in the Plan deal with wind turbines, all reference to turbines in Policy ENV4 should be deleted.

Figure 1 should not illustrate turbines as this implies they sit comfortably in the landscape; instead they are regarded as alien in the landscape, contrary to all commentary in the GMSF and Natural England guidelines to this very landscape, and we do not accept that they are an established baseline to be recorded.

Draft Policy ENV8

We object to this policy in the strongest terms.

The policy and supporting text talk in positive terms about areas 'being suitable' for turbine development. One thing that is clear from the appeal and call-in decisions referred to earlier in this representation is that the appropriateness or otherwise of turbine development within a landscape is a hugely complex matter; a pro-turbine policy such of ENV8 fails to recognise this complexity.

The draft supporting text refers to the June 2015 Written Ministerial Statement, and recognises the importance of local opinion emphasised in that WMS. The Scout Moor public inquiry heard that 97% of respondents to that application were against the proposal. This reflects the sentiment of the local community when the existing Scout Moor development was consented a decade ago (at that time Rossendale refused the planning application). Turbines are not welcome in this landscape, and the community does not wish to see additional turbine development.

The draft policy again refers to the Julie Martin study, which dates back to 2014; we'd restate that that document is out of date, and has been discredited through the Scout Moor call-in process. Indeed, the council's own landscape consultee to the planning application (as recorded in the officer's report to committee) recommended that the landscape impacts of additional turbines would be unacceptable.

There is no need for a 'wind turbine area of search'; it is not a requirement on the LPA.

Policy ENV8 should be deleted, and the tests set out in draft policy ENV9 instead relied upon (subject to our further comments to that policy).

Draft Policy ENV9

We object to this policy in the strongest terms.

The starting presumption is that turbines 'will be supported'. Given the recent decisions cited above, this should not be the starting position of the LPA.

The draft policy again refers to the Julie Martin study, which dates back to 2014; we'd restate that that document is out of date, and has been discredited through the Scout Moor call-in process. Indeed, the council's own landscape consultee to the planning application (as recorded in the officer's report to committee) recommended that the landscape impacts of additional turbines would be unacceptable.

There should instead be a presumption against turbines, and any proposal for turbines should be assessed in accordance with the tests set. Reference to the Julie Martin study should be removed.

Draft Policy ENV10

We object to this policy.

Whilst renewable energy may be appropriate on a very small-scale (single dwelling), the LPA should adequately prepare for applications for 'solar farms' (or other large scale renewable energy development): large-scale solar development would have a considerable adverse impact on the landscape, and any policy should set out the tests to be met within the policy itself (not in the explanation) in order to give the tests the status; this is the approach the LPA has already taken with draft policy ENV9.

Tests should be added to the body of the policy, to ensure that the adverse impacts of such development are properly considered, and additional tests considered (such as those in draft ENV9).

Proposed New Policy

We propose a policy covering all the upland areas, explicitly recognising the value of the open-ness in accordance with draft policy GM10 of the GMSF, and how incongruous structures, such as turbines, would be considered inappropriate development and refused planning permission We propose a policy that all existing turbine development is to be regarded as inappropriate development, that there is a presumption to reinstate the open-ness of the uplands, and that upon expiry of planning permission in each instance there shall be a presumption against renewal of those consents.

This group will work constructively with the LPA through its Local Plan review to ensure that that a robust defence is made of the open-ness of these uplands. Parallel representations will also be made the local plan reviews in neighbouring authorities, and to the GMSF.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV7: Wind Turbines

9.38 Peel supports the proposed allocation of the area for commercial wind turbines as shown on the proposals map reflecting the viability and suitability of such provision in this location. However, there are a number of aspects of Policy ENV7 which Peel does not currently support and which it considers to be unsound.

9.39 Firstly there is no reasonable justification for supporting only 'community led' wind turbines. The suitability of any wind turbine proposals will be judged on their own merits, having regard to the prevailing policy context. It is unreasonable to single out a specific type of operator / owner for special treatment and, in effect excluding other types of operator / owner. This aspect of the policy is unsound.

9.40 The repowering of existing turbines may provide a viable and efficient way of creating new renewable energy capacity. Where existing turbines are present, these schemes have clearly been proven to be acceptable in policy and environmental terms in the past. Whilst applications for repowering would need to be considered on their own merits, having regard to the prevailing planning policy and environmental context, such locations are, in principle, suitable for wind turbines. In this context, it is inappropriate to establish a presumption against repowering of existing turbines outside of the defined area, as proposed within Policy ENV7. This would potentially preclude an otherwise acceptable development and an effective and efficient means of delivering an increase in renewable energy capacity from being delivered. The policy is overly onerous and restrictive in this regard.

9.41 This is compounded by the policy seemingly providing in principle support for the development of wind turbines up to 25m anywhere in the Borough. This may lead to greater overall environmental harm, in cumulative terms, than supporting, as first principle, the repowering of existing wind turbines.

9.42 The second paragraph of the policy should therefore be reworded as follows:

Areas suitable for commercial wind turbines have been identified on the Policies Map. Single, and exceptionally, small groups of turbines of up to 59m may be suitable in the "Enclosed uplands areas suitable for wind turbines" shown on the policies map. New larger turbines may be considered on the "High Moorland Plateau Areas Suitable for Wind Turbines" shown on the Policies map provided areas of deep peat (40cm depth) and blanket bog are avoided. Development of new wind turbines outside these areas would be resisted. The repowering of existing wind turbines will be determined will be supported where it is proven that this will not lead to unacceptable environmental and other impacts.

9.43 The policy outlines that commercial wind farm developments will be supported subject to impacts identified by the local community having been taken into account and fully addressed. Peel does not agree with this criterion in its current form. The views of the local community are important and should be capable of influencing the design and planning process. Requiring a development to take the views of the local community into account is not unreasonable. However, some views of the community may be in conflict with the prevailing evidence developed as part of a planning application (e.g. in relation to noise or visual impact) whilst some matters raised may not be relevant to the planning process. It is unreasonable to expect a developer to 'address' all issues raised by the local community in this regard insofar as this could be interpreted as a requirement for the scheme to reflect every requirement and request identified by the community.

9.44 This aspect of the policy should be amended to require developers to 'secure the input of the local community and show how their views have been taken into account in developing the scheme.'

9.45 The policy identifies that the opportunity to 'screen' wind turbines will be one consideration in determining the appropriateness of their scale, height and siting. The opportunity to 'screen' a wind turbine rarely exists, though steps can often be taken to reduce visual impact through appropriate siting or colouring for example. The reference to 'screen' should be removed therefore.

9.46 The fourth bullet point of the policy should be amended to reflect that the limited scope for different design interpretations of wind turbines to respond to a site's physical setting and context. Achieving a wind turbine scheme which can be deemed to be objectively 'appropriate to its setting' will often not be possible given the prevailing

countryside context in which such developments are typically delivered. Reflecting this, the fourth bullet of the policy should be rewritten as follows:

Reasonable steps are taken to ensure the massing, colour and layout of turbines to respect their setting as far as practicable

9.47 The criterion requiring that ‘shadow and reflective flicker impacts on buildings and public rights of way’ should be amended to remove reference to ‘a precautionary approach taken to mitigation’. Conservative assumptions are typically inherent within any impact assessment and associated mitigation strategy to provide an appropriate degree of certainty that a) the impacts represent a worst case scenario and b) that the mitigation measures will be effective. In effect, a precautionary approach is typically taken as standard. This aspect of the criterion should therefore be removed.

9.48 The eighth bullet refers to noise impact. Inherent within any noise assessment for a wind turbine scheme is the requirement to consider amplitude modulation. There is no requirement to single this out as a specific aspect of noise to be considered. This should be removed from the policy.

9.49 The stipulation that ‘no development is proposed on peat depth of over 40cm’ should be deleted. This is entirely arbitrary and fails to take account of the fact that such development may be small in nature, e.g. road crossing, and can be mitigated elsewhere by restoration and improvement techniques across a far wider area, resulting in more gains than losses.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5170 Mr Melanie Lindsley The Coal Authority** Number of supporters:

Commenting on ENV7

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan comply with the duty to co-operate? **Yes**

Support – The Coal Authority supports the inclusion of this policy and notification that the impact on geology, including former mine workings should be fully appraised and issues identified and addressed, including restoration plans as appropriate;

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5172 Mr Alex Rowe Natural England** Number of supporters:

Commenting on ENV7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan comply with the duty to co-operate? **Did not answer**

Policy ENV7: Wind Turbines

Natural England welcomes the inclusion of policy criteria that states the following: “No development is proposed on areas of peat of over 40cm depth”. The explanatory text contained in the Local Plan also states that: “Development on deep peat (over 40cm depth) or blanket bog within the area suitable for wind turbines should be avoided”, which is welcomed.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

ENV6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy ENV6: Environmental Protection

2.100 We do not wish to make any detailed comments on the wording of this policy, other than in relation to the provision of electric charging points. The policy expects all new housing developments to provide electric charging points, unless exceptional circumstances can be demonstrated. Whilst Taylor Wimpey are not opposed to the provision of electric charging points, it is considered that the mandatory provision of electric charging points on all housing sites is unrealistic and overly restrictive.

2.101 Instead, we recommend that further flexibility is added in the policy, which would allow for the consideration of reasons which may make the provision of electric charging points on a site unachievable/impractical. This could be easily achieved by changing the wording of the policy to say the provision of electric charging points on housing sites 'where practical', as opposed to requiring exceptional circumstances to be put forward as to why this could not be achieved on site.

LAND WEST OF MARKET STREET, EDENFIELD

Policy ENV6: Environmental Protection

2.87 We do not wish to make any detailed comments on the wording of this policy, other than in relation to the provision of electric charging points. The policy expects all new housing developments to provide electric charging points, unless exceptional circumstances can be demonstrated. Whilst Taylor Wimpey are not opposed to the provision of electric charging points, it is considered that the mandatory provision of electric charging points on all housing sites is unrealistic and overly restrictive.

2.88 Instead, we recommend that further flexibility is added in the policy, which would allow for the consideration of reasons which may make the provision of electric charging points on a site unachievable/impractical. This could be easily achieved by changing the wording of the policy to say the provision of electric charging points on housing sites where practical, as opposed to requiring exceptional circumstances to be put forward as to why this could not be achieved on site.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5213 Mr J. Hignett**

Number of supporters:

Commenting on

ENV7

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RE: ROSSENDALE LOCAL PLAN, DATED 5 OCTOBER 201B

I am disappointed to note that the LPA has included large areas of moorland as potential sites for the development of wind farms; this is despite the decision reached by an independent inspector at the Scout Moor Call-in inquiry. At that inquiry evidence was presented that demonstrated Rossendale Borough Council's financial reliance on developing wind turbines on its land holdings on Scout Moor (deriving rental income from Peel Holdings' aspirations to extend the current windfarm). Evidence included public statements from the council's chief financial officer, recorded on council minutes, imploring members to support the development of turbines as a source of income. Whilst this is not strictly a planning matter, it is of great concern that the promotion of pro-turbine policies suggests an LPA to be primarily motivated by financial return rather than sound planning and disregards the findings of the call-in inquiry.

DRAFT POLICY ENV7

The majority of new wording of draft policy ENV7 is unclear and extensively contradictory: as drafted the policy is wholly inadequate. I would make the following observations:

- Use of the phrase 'community led ' is evidently unclear: does the community include the pro-turbine council, a local developer and owner of the existing wind farm such as Peel Holdings, or a farmer looking to expand existing turbine development on his land?
- The areas of search include areas where the Secretary of State refused proposals in 2017 for additional turbines on Scout Moor, citing landscape impact as the reason for refusal. The council's evidence base relies on an out of date (2014) council-commissioned landscape study, which pre-dates the development of many new turbines locally, and the Secretary of State's recent (2017) decision. The council's position is completely untenable. The Areas of Search should be deleted.
- Policy states that turbines outside of the Areas of Search would be resisted; which flies contrary to other parts of the policy which state "Community led proposals for wind turbines in all parts of the Borough will be supported"; this is unclear, and inadequate as policy,
- There is extensive and seemingly contradictory commentary on what will and will not be allowed in terms of turbine height.

I support the list of criteria set out at the end of the policy, that is:

Proposed text for ENV7 (taken from current draft ENV7)

"Proposals for commercial wind farms and individual turbines (including repowering of existing schemes) within Areas of Search shown on the Policies Map will only be supported if the following criteria are addressed to the satisfaction of the Local Planning Authority:

- The impacts identified by the local community have been taken into account and fully addressed

Indeed, it would appear that this wording should suffice as the Local Plan turbine policy, without the policy text that precedes it. I would suggest the addition of the following text to the criteria: 'the turbines and associated infrastructure should avoid areas of blanket bog', as referred to elsewhere in the current draft ENV7. I would also suggest that reference to decommissioning includes the text: 'and a commitment to funding the entire decommissioning of the turbine and all associated infrastructure'.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5214 Mrs	C. E.	Hignett	Number of supporters:
Commenting on			ENV7	
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
RE: ROSSENDALE LOCAL PLAN, DATED 5 OCTOBER 201B				
<p>I am disappointed to note that the LPA has included large areas of moorland as potential sites for the development of wind farms; this is despite the decision reached by an independent inspector at the Scout Moor Call-in inquiry. At that inquiry evidence was presented that demonstrated Rossendale Borough Council's financial reliance on developing wind turbines on its land holdings on Scout Moor (deriving rental income from Peel Holdings' aspirations to extend the current windfarm). Evidence included public statements from the council's chief financial officer, recorded on council minutes, imploring members to support the development of turbines as a source of income. Whilst this is not strictly a planning matter, it is of great concern that the promotion of pro-turbine policies suggests an LPA to be primarily motivated by financial return rather than sound planning and disregards the findings of the call-in inquiry.</p> <p>DRAFT POLICY ENV7</p> <p>The majority of new wording of draft policy ENV7 is unclear and extensively contradictory: as drafted the policy is wholly inadequate. I would make the following observations:</p> <ul style="list-style-type: none"> • Use of the phrase 'community led ' is evidently unclear: does the community include the pro-turbine council, a local developer and owner of the existing wind farm such as Peel Holdings, or a farmer looking to expand existing turbine development on his land? • The areas of search include areas where the Secretary of State refused proposals in 2017 for additional turbines on Scout Moor, citing landscape impact as the reason for refusal. The council's evidence base relies on an out of date (2014) council-commissioned landscape study, which pre-dates the development of many new turbines locally, and the Secretary of State's recent (2017) decision. The council's position is completely untenable. The Areas of Search should be deleted. • Policy states that turbines outside of the Areas of Search would be resisted; which flies contrary to other parts of the policy which state "Community led proposals for wind turbines in all parts of the Borough will be supported"; this is unclear, and inadequate as policy, • There is extensive and seemingly contradictory commentary on what will and will not be allowed in terms of turbine height. <p>I support the list of criteria set out at the end of the policy, that is:</p> <p>Proposed text for ENV7 (taken from current draft ENV7)</p> <p>"Proposals for commercial wind farms and individual turbines (including repowering of existing schemes) within Areas of Search shown on the Policies Map will only be supported if the following criteria are addressed to the satisfaction of the Local Planning Authority:</p> <ul style="list-style-type: none"> • The impacts identified by the local community have been taken into account and fully addressed <p>Indeed, it would appear that this wording should suffice as the Local Plan turbine policy, without the policy text that precedes it. I would suggest the addition of the following text to the criteria: 'the turbines and associated infrastructure should avoid areas of blanket bog', as referred to elsewhere in the current draft ENV7. I would also suggest that reference to decommissioning includes the text: 'and a commitment to funding the entire decommissioning of the turbine and all associated infrastructure'.</p>				
Do you wish to participate to the Examination In Public?	Did not answer	Reasons		
MAP P.12 - Landscape Character Map of Rossendale.....				

Reference **82 Dr. Falmai Youngman** **Bury Rural Inequalities Forum - BRIF** Number of supporters:
Commenting on - Policy ENV7 MAP P.12 - Landscape Character Map of Rossendale.....
Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**
Representations are attached with regard to our reservations (Please see appendix)

Representations are attached with regard to our reservations.I have uploaded the refs from my representation only in part as these were seperate scans of the same 3 pages of a document. I intend to send the 3rd 3/3 to Anne Storah of RBC seperately to complete this document for the Inspector correctly.

Do you wish to participate to the Examination In Public? **Yes** Reasons Our organization was seriously involved in the last attempt to develop a major windfarm in the area - and there is no doubt in our mind that it is most important to give oral representation. We would be most grateful of this consideration to explain the particular aspect of the visual damage to our rural area across the Valley to Rossendale Scout Moor. Our expert witness Dr. Alan Heyworth has also agreed to give evidence of the need to protect and regenerate the peat fileds which could be damaged and are most important ecologically for the High Plateau of Moorland.

Number of comments in this section 11

Comments on policy ENV08 Other Forms of Energy generation

Reference **2 Mr John Lamb** **Lancashire Wildlife Trust Ltd.** Number of supporters:
Commenting on - ENV8
Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**
None of the issues listed consider biodiversity, other than fish, and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors.The NPPF requires development to deliver net gains in nature.
Specific consideration of biodiversity, including fish, and any effect on recognised wildlife sites, habitats, species, ecological networks and/or wildlife corridors.Requirement for development to deliver net gains in nature. This may be most effective if it enhances recognised wildlife sites, habitats or species populations relevant to any ecological networks that the site lies within or adjacent to.
Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
Commenting on	ENV8				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
RCT supports ENV8.					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference	5160	The Peel Group			Number of supporters:
Commenting on	ENV8				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
Policy ENV8: Other forms of Energy generation					
9.50 Peel supports the generality of Policy ENV8 and suggests that it might also serve as a model for ENV7 which is currently overly prescriptive, having regard to the issues outlined above.					
9.51 Notwithstanding this, it should be pointed out that a proposal for a gas-based generator using existing gas distribution infrastructure would not be the purview of Lancashire County Council. The policy would benefit from clarification that only those proposals requiring new fuel extraction infrastructure would be the responsibility of Lancashire County Council.					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference	5170 Mr	Melanie	Lindsley	The Coal Authority	Number of supporters:
Commenting on	ENV8				
Is the Local Plan legally compliant?	Yes	Is the Local Plan sound?	Yes	Does the Local Plan complies with the duty to co-operate?	Yes
Support – The Coal Authority is pleased to see signposting in this policy to the Lancashire County Council as Minerals and Waste Authority in respect of extraction of carbon based resources.					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			
Number of comments in this section 4					

Comments on policy ENV09 Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

ENV9

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support ENV9, and note that the Council commissioned JBA Consulting to undertake a Level 1 and Level 2 Strategic Flood Risk Assessment (2016) for Rossendale8. This study looked at a large number of potential development sites in the Borough and made recommendations in relation to their potential flood risk. The Council has taken the recommendations into account when considering individual site assessments for the Local Plan. RCT note that Rossendale has many wet and well spring'd slopes, and of the long tradition of private culverts to water courses and even to public sewers, which with the private sewers transfer, we should gradually see being recorded, and possible need's to require SuDS works.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5154 Mr****Philip****Carter****Environment Agency**

Number of supporters:

Commenting on

ENV9

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Issue We note that this has replaced Policy ENV9 replaces Policy ENV11 from the Regulation 18 consultation. For the most part, we are satisfied that the revised policy takes in to account most of our previous comments. However, while the SFRA is now cross-referenced, it still remains unclear that the recommendations of the SFRA must be taken into account when development is proposed in allocated sites.

Impact Without clearly linking SFRA recommendations to proposed site allocations, all mitigation measures necessary to safely develop the relevant sites may not be fully understood by developers.

Solution To address our concerns, we would recommend the following revisions:-

Assessment should be informed by consideration of the most up to date information on Flood Risk available from the Environment Agency, any site-specific recommendations identified in the Strategic Flood Risk Assessment (SFRA) and from the Lead Local Flood Risk Authority.

All allocated sites with flood risk issues that have been considered in the SFRA should be clearly identified in the justification supporting Policy ENV9 and cross-referenced with the relevant section of the SFRA such that developers can readily identify and link the site allocation with the SFRA recommendations. This is not currently possible.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5160**

The Peel Group

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality

9.52 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference	5168	Adam	Brennan	United Utilities	Number of supporters:
Commenting on		ENV9			
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer

Specific Comments

Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality:

United Utilities generally has three categories in relation to its sewer network. Firstly, surface water sewers that will only take the surface water flows. Secondly, the foul sewers in our network will only take foul flows. Then finally, there are combined sewers that takes both foul and surface water flows. ENV9 indicates that surface water can discharge into the foul network, but it would not be permitted by United Utilities. We would strongly recommend this is removed from the policy.

United Utilities cannot emphasise enough the importance of applying the surface water hierarchy in an era when the impacts of climate change are ever more present. It is noted that Policy ENV9 contains positive messages that are welcomed by United Utilities. However, it fails to note the need for applicants follow the surface water hierarchy as outlined in the NPPG.

We believe it would be more appropriate to split ENV9 into two policies so that the issues of flood risk and surface water management are dealt with separately. We believe this approach will appropriately embed the intentions of national policy with respect to meeting the requirements of the surface water hierarchy and the inclusion of genuine sustainable drainage systems. The Local Plan would then mimic national policy with respect to meeting the requirements of the hierarchy and encourage the inclusion of genuine sustainable drainage systems. It is our view that a separate planning policy would set out a clear process in relation to Surface Water Management, creating an approach to drainage for all new development, rather than applications within certain criteria. We would hope you consider the wording below as an example of a separate policy on surface water management and sustainable drainage.

We suggest the following parts with a line through of ENV9 are deleted, and our suggestions to the wording are in blue:

*The following modifications proposed by UU, in blue and with a line through, can be viewed in the Apendix.

Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality

All Development proposals including on allocated sites will be required to consider and address flood risk from all sources. A sequential approach will be taken and planning permission will only be granted for proposals which would not be subject to unacceptable flood risk, or materially increase the risks elsewhere and where it is a type of development that is acceptable in the Flood Plain. Assessment should be informed by consideration of the most up to date information on Flood Risk available from the Environment Agency, the Strategic Flood Risk Assessment (SFRA) and from the Lead Local Flood Risk Authority.

Developers will be expected to provide appropriate supporting information to the satisfaction of the Local Planning Authority such as Flood Risk Assessments for all developments in Flood Zones 2 and 3. Site specific mitigation measures should be clearly identified.

All development proposals will be required "to consider the contribution landscaping can make to" manage surface water as part of the development and should seek to maximise the use of permeable surfaces/areas of soft landscaping, and the use of Green Infrastructure as potential sources of storage for surface water run-off. (New development should not increase on-site or off-site surface water run-off rates and, where practicable, should seek to reduce surface water run-off to greenfield rates. Discharge of surface water into the public sewer network should only be considered where it can be demonstrated that no other option is feasible.)

Proposals for major development as identified by the Town and Country Planning (Development Management Procedure) (England) Order 2015 and subsequent amendments will be expected to incorporate Sustainable Drainage Systems (SuDS) which manage any surface water run-off arising from the development and minimise the risk of flooding on the development site and in the surrounding area. The proposed drainage measures should fully integrate with the design of the development and priority should be given to SuDS techniques which make a positive contribution to amenity, biodiversity and water quality as well as overall climate change mitigation. Alternatives to SuDS will only be permitted where it is demonstrated that SuDS are impractical or there are other exceptional circumstances. All SUDS schemes should incorporate clear implementation,

management and maintenance arrangements. The preference is for development include genuine, above ground sustainable drainage systems as opposed to underground tanked storage systems for surface water.

Proposals for minor development in areas at risk of flooding should also incorporate of SuDS into the design of the scheme unless there is clear evidence that it would be inappropriate. Drainage proposals for minor schemes should at least demonstrate that SuDS solutions have been considered.

Development proposals which discharge surface water runoff to foul drainage connections or combined sewers will only be permitted if it has been demonstrated that:

- Separate surface water drainage is not available and cannot be practicably provided;
- Sufficient capacity exists in the foul or combined sewer; and
- The proposal would not exacerbate the risk of flooding or result in deterioration in water quality. Use of septic tanks will only be permitted where connection to the foul sewer network is not feasible.

Further to these changes, we suggest that separate policy is included, relating to Surface Water Management. We suggest the following is included:

ENV10 – Surface Water Management

The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency.

Surface water should be discharged in the following order of priority:

1. An adequate soakaway or some other form of infiltration system.
2. An attenuated discharge to surface water body.
3. An attenuated discharge to public surface water sewer, highway drain or another drainage system.
4. An attenuated discharge to public combined sewer.

Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application.

The expectation will be for only foul flows to communicate with the public sewer. Approved schemes will be expected to be supplemented by appropriate maintenance and management regimes for the lifetime of any surface water drainage schemes.

On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked.

On previously developed land, applicants will also be expected to follow the surface water hierarchy.

Thereafter, any proposal based on a proposed reduction in surface water discharge from a previously developed site should be in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA (or any replacement national standards) which target a reduction to greenfield run-off rate. In demonstrating a reduction, applicants should include clear evidence of existing positive operational connections from the site with associated calculations on rates of discharge.

Any drainage proposal as part of a wider Local Plan allocation will be expected to be part of a site wide strategy to avoid a piecemeal approach to drainage and demonstrate how the site delivers sustainable drainage as part of interconnecting phases. It is important that any early phases of development provide the sustainable surface water drainage infrastructure to meet the needs of any later interconnecting phases of development.

Do you wish to participate to the Examination In Public? Did not answer Reasons

Number of comments in this section 4

Comments on policy ENV10 Trees and Hedgerows

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

ENV10

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support ENV10 and note that Rossendale generally has a low level of tree coverage and the retention and protection of trees, woodland and hedgerow is critical in terms of biodiversity and also to protect the Borough's individual landscape and character. Trees and hedges also have an important role in management of climate change including urban cooling effects. Core woodland areas exist at Whitworth, Buckshaw Brow, Edenfield and the Ogden Reservoir Valley and these areas are connected by "stepping stone" habitats as identified on the Lancashire Ecological Network Maps. RCT note the legacy of Lancashire County Council and Rossendale Groundwork's often Countryside Commission/Natural England and Forestry Commission grant funded tree plantings; and the so far unsuccessful LCC grant bid funded Community Woodland Project from Cloughfold to Waterfoot.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy ENV10: Trees and Hedgerows

9.53 The retention of trees and hedgerows within development proposals will not always be possible or practical and it is important that policy compliant proposals are able to proceed where this is the case, if justified having regard to the wider benefits of the proposal.

9.54 The bullet points in paragraph 3 of the policy should therefore be amended as follows:

- Not result in the loss of trees or woodland which are subject to a TPO or which are considered worthy of protection where possible;
- Not give rise to a threat to the continued well-being of retained trees, woodland or hedgerows where possible;
- Not result in an adverse impact on the Green Infrastructure where it is within or adjacent to identified Green Infrastructure networks where possible; and
- Make a positive contribution to biodiversity, where possible.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section

2

Chapter 5: Leisure and Tourism

Comments on policy Leisure and tourism Leisure and Tourism

Reference **5160**

The Peel Group

Number of supporters:

Commenting on

LT3 to LT6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policies LT3 to LT6

9.57 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy LT1 Protection of Playing Pitches, Existing Open Spaces and Sport and Recreation Facilities

Reference **5018**

Brian Michael

Kathy Fishwick

Rossendale Civic Trust

Number of supporters:

Commenting on

LT1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support LT1 and note that the Council commissioned a Playing Pitch Strategy for the Borough (2016) which identified a deficit of football pitches and rugby pitches and recommended that all existing pitches should be retained, including those not currently in use. Development on such pitches will only be permitted if replacement of equal or higher quality is provided elsewhere in the Borough. RCT however note the Council's recent planning permission for housing on a private football pitch and adjoining Council Greenland, where the replacement pitch is some distance at Marl Pits. There's reference to "Hubs", but neither Haslingden and Marl Pits are on regular bus routes. And where's the Hub for East Rossendale?

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5158 Ms	Helen	Ledger	Sport England	Number of supporters:
Commenting on			LT1		
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>Dear Planning Policy Team,</p> <p>Thank you for allowing us to make more comments and meeting me to expand on the issues I have previously raised.</p> <p>Thank you for giving due consideration to my comments made at earlier stages. I note at this stage of the local plan comments are invited on soundness, legal compliance and the duty to cooperate only.</p> <p>Policy LT1</p> <p>Thank you for making the changes I sought to the final bullet point on education sites, which are welcomed.</p> <p>I now feel the policy strongly reflects national policy in the NPPF para 97 and Sport England’s policy on playing fields and that, for playing fields it is supported by a robust evidence base, the playing pitch strategy. Where the policy is still lacking is that it is not supported by an evidence base on built sports facilities. The council has a range of sports facilities operated for it by a leisure trust, as well as community groups and the private sector. Without up to date evidence it is not possible to ascertain whether facilities are surplus to requirements or whether there are sufficient to meet the areas needs. An assessment of both is required to ensure this policy can work effectively. I would query whether without this evidence base on built sports facilities the plan is ‘justified’ or ‘consistent’ with national policy in the NPPF paragraph 96.</p> <p>Sport England have prepared support, guidance and a methodology to ‘Assess needs and opportunities for built sports facilities’ which are available from our website: https://www.sportengland.org/facilities-planning/planningfor-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/</p> <p>Thanks to a series of helpful discussions with the council and the leisure trust, both sides now understand the need for this evidence and Sport England has offered to support the council in developing this. So as not to impede the progress of the local plan, which is well advanced, but also to achieve a positive outcome and working relationship, the council has now committed to resolve the deficit in the evidence base shortly after adoption of the plan. To ensure this happens Sport England propose the following addition of a new paragraph of supporting text to Policy LT1:</p> <p>Given the important role indoor sports facilities play in promoting the physical and mental well-being of the community, the Council will work closely with Sport England and other partners to ensure that any future decision on the provision of all sports facilities is based on a robust and up-to-date evidence base. To assist with this, it is the intention of the Council to produce an Indoor Sports Strategy during the next 12 -24 months to help underpin effective policy application.</p> <p>If this new proposed paragraph can added in the supporting text under policy LT1 then Sport England will not raise an objection to the Local Plan against the Justified and Consistent with nation policy soundness tests.</p> <p>To further support this I would also propose Sport England and the Council develop a Statement of Common Ground in due course on this matter to help the inspector consider this matter at the examination in public.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy LT1: Protection of playing pitches, existing open space , sport and recreation facilities

9.55 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 3

Comments on policy LT2**Community Facilities**Reference **110 Mr Tom****Clarke MRTPI****Theatres Trust**

Number of supporters:

Commenting on - LT2

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

We welcome the inclusion of cultural facilities within this policy which is consistent with the NPPF, and of the protection the Plan affords to such facilities.

N/A

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
Commenting on	LT2				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>RCT support LT2 and note that the provision and retention of community facilities is considered to be integral for ensuring that communities are sustainable in the long term. The Council will however safeguard community facilities against unnecessary loss, particularly where this would reduce the community's ability to meet its day to day needs locally, unless it is demonstrated that the facility which would be lost is no longer required or suitable or that an appropriate replacement facility would be provided. RCT note the 1974 Local Government Reorganisation legacy of spending balances and loading future generations, still retains, the over budgeted Haslingden Sports Centre, Marl Pits Swimming Pool and Sports Facilities, and Whitworth Swimming Pool. However Bacup no longer has its Leisure Centre, and it's unclear how far the facilities at Fearn's Comprehensive School were intended to be a Joint User Project by Lancs CC, as Bacup BC did not appear to provide funding. East Rossendale is now less well provided for, and is proposed to have most new housing.</p> <p>RCT also note a 1995 Sports Council funded project at Fearn's: its Fearn's Dual Use Scheme Management Agreement provision for funding directed to a community use, however there is at 26 February 2004 Council a line on 2004/5 Savings – Fearn's, end capital contribution £39,950, but that's all: no sign, so far, of the decision process taken by Members and Officers.</p>					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference	5160	The Peel Group	Number of supporters:
Commenting on	LT2		
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer
<p>Policy LT2: Community Facilities</p> <p>9.56 Peel does not agree that all of the criteria listed at a to e should be required to be satisfied permit a proposal involving the loss of a community facility to proceed rather only one of these criteria should be required to be met. 'And' should therefore be replaced by 'or' after each criterion as listed.</p>			
Do you wish to participate to the Examination In Public?	Did not answer	Reasons	
Number of comments in this section	3		

Comments on policy	LT3	Tourism
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Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

LT3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT supports LT3 and note that the tourism sector has an important role to play in Rossendale's future prosperity. As reported in the 2017 Rossendale Town Centre, Retail, Leisure and Tourism Study, STEAM data from 2015 noted that Rossendale attracted 2% of all tourist visiting Lancashire, providing a total economic impact of £53m, which had grown by 3% from the previous year. RCT also notes that an ageing population might be more likely to come to see heritage assets, and at times notes that its Grade II Listed Weavers Cottage on Bacup Road is often left off local lists.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy **LT4** **Overnight Visitor Accommodation**

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

LT4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support LT4 and note A key finding of the 2017 Town Centre, Retail, Leisure and Tourism Study is that whilst the tourist economy in Rossendale is improving, the Borough is lacking in overnight accommodation, with 'staying visitors' accounting for just 22% of the total 'visitor days' recorded in the Valley in 2015 (compared to 31% at the county level). As the tourism offer improves in the Borough it expected that the number of overnight stays will increase. STEAM data from 2015 noted that Rossendale only has 268 visitor 'beds' distributed throughout the Borough, with no modern hotel space available. Accordingly this Report recommended that the Council should prioritise overnight accommodation and look to promote delivery of a modern 'budget' hotel to serve the Rossendale area.

However RCT also note past unsuccessful developer's aims for hotels in New Hall Hey, and site of demolished Accrington and Rossendale College. RCT is concerned that the notion of a "budget" hotel, as a priority, is not just looking for a use to go onto the Council/RTB's site of the demolished Valley Centre. Could more rooms close to local pubs, restaurants and Just Eat "takaways" be as attractive for "staying visitors", than the utilitarian, out by 10.00am, ambience of a "budget" hotel. Or somewhere safe to "park-up" their VW Camper Van.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Comments on policy **LT5** **Equestrian Development**

Reference **2 Mr John Lamb Lancashire Wildlife Trust Ltd.** Number of supporters:

Commenting on - LT5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

There is no reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors. In accordance with the requirements of the NPPF, development should deliver net gains in nature.

Specific reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors. In accordance with the requirements of the NPPF, development should deliver net gains in nature.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5018 Brian Michael Kathy Fishwick Rossendale Civic Trust** Number of supporters:

Commenting on LT5

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support LT5's aims To minimise the visual impact of proposals, the design, siting and scale of any new or extended stables and associated infrastructure will be expected to be appropriate to its context and should not have an adverse impact on the visual amenity of its surroundings.

RCT question policy on use timber, it does burn and horses don't use keys, and note recent stables in stone, visible from A56 near Edenfield

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy LT6 Farm Diversification

Reference **2 Mr John Lamb** **Lancashire Wildlife Trust Ltd.** Number of supporters:

Commenting on - LT6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Specific reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors. In accordance with the requirements of the NPPF, development should deliver net gains in nature.

There is no reference to the need to consider biodiversity and any effect on wildlife sites, habitats, species, ecological networks and/or wildlife corridors. In accordance with the requirements of the NPPF, development should deliver net gains in nature.

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **5018** **Brian Michael Kathy Fishwick** **Rosendale Civic Trust** Number of supporters:

Commenting on LT6

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support LT6, and suggest specific support for funding grant applications for projects that would bring benefits to the community in terms for example of improved access to the countryside outside the Urban and Green Belt Boundaries.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Chapter 6: Transport

Comments on policy TR1

Strategic Transport

Reference **5000 Ms**

Diane

Clarke

Network Rail

Number of supporters:

Commenting on

TR1

Is the Local Plan legally compliant?

Did not answer

Is the Local Plan sound?

Did not answer

Does the Local Plan complies with the duty to co-operate?

Did not answer

As you are aware Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order); in addition you are required to consult the Office of Rail and Road (ORR).

Given Rossendale Council's aspiration for the East Lancs Railway to be developed as a commuter rail link; is Rossendale Council aware of the current work/proposals led by Rochdale Council on interfacing the East Lancs Railway with the heavy rail network?

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference	5018	Brian Michael	Kathy Fishwick	Rossendale Civic Trust	Number of supporters:
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Commenting on	TR1
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Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
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RCT support TR1 and note that Traffic congestion in Rossendale is most pronounced around the gyratory in Rawtenstall but is also evident from Crawshawbooth into Rawtenstall, Haslingden Tesco roundabout, in Waterfoot and Stacksteads. A new bus station is currently being built in Rawtenstall as part of the Spinning Point development and the Council will explore other opportunities to improve bus services. However RCT sees a need to remind us all of the roles in Rossendale of GOV UK:-

A. Rossendale in Lancashire's Roads.

While there is now only a heritage railway, some parts of Rossendale are well served by roads. More were to be, but as you can see from this 1965 LCC Major Road Proposals Plan, the M65 is not there, nor the use of the Haslingden Bye-pass as an A56T diversion instead of the Crawshawbooth Bye-pass.

This left Rawtenstall with just the dual carriageway of St Mary's Way, meeting, at "Tup Bridge", the single carriageway Burnley Road. There are many local memories of its original Queens Square Bus Station on the site of what's now the Fire Station.

And there's an abandoned section of Pedestrian Underpass, intended for a new Queens Square Bus Station; but this was, RCT believe, prevented by? GOVUK's DOE or MoT, the highway authority, or the North West Roads Construction Unit who were responsible for the design and construction of these roads?

B. The A56T Diversion from Rawtenstall to Haslingden.

RCT see that the 1970s abandonment of the Crawshawbooth Bye-pass, with up to 4 alternate routes, has moved the focus for new development towards the M66/A56T Corridor. What's now classed as Rossendale West: Edenfield, Helmshore, Haslingden, Acre, and Rising Bridge, has since the 1980s seen the construction of new housing estates, business parks, and retail outlets.

Compare Haslingden Sykeside Tesco's Business Rates of £210/sqm with Rawtenstall Bocholt Way Tesco's £180/sqm, the X41 Transdev commercial bus service from Blackburn to Manchester via Rising Bridge, Acre, Haslingden and Helmshore with no reason to detour to a Rawtenstall Bus Station. Rawtenstall is reached by the 464 Rosso from Accrington to Rochdale. But as for "sustainable transport modes" in terms of NPPF 2012, RCT note the long walks between bus stops in Haslingden for these services – Not quite Super Stops? Not part of a "Hub and Spoke" bus route pattern. How sustainable to need to look at car park charges to help with running costs of Rawtenstall Bus Station – no grant "free money".

C. RCT note these proofs of how Rossendale's roads were "sorted" with no local say:

Hansard 29 March 1972

Mr Michael Heseltine. Alternative routes for the northern end of the Edenfield-Rawtenstall by-pass to the Calder Valley fast route, details of which were announced by my hon. Friend the Minister of Local Government on 17 March, are currently being investigated. In the meanwhile work on detailed plans for the Crawshaw-booth bypass had been suspended. However minor improvements to the A56 are being considered.

Haslingden Bye-pass Public Enquiry Inspector Philip M Vine 17 June 1976:

75. Bearing in mind the above facts, I reach the following conclusions:-

1 With regard to the Department's intention that the Haslingden Bye-pass shall form the outhern

section of a diversion from Bent Gate to Huncoat of the existing A56 from Rawtenstall to Burnley, I am unable to reach the conclusion that such diversion is preferable to an improvement on the line, or approximate line, of the existing A56. Although the diversion of the A56 as proposed by the Department may well be the preferred solution to the undoubted inadequacy of the existing A56, insufficient evidence was tendered by the Department to justify such a conclusion.

No evidence, or insufficient evidence was given as to:-

- a) comparative costs of construction,
- b) comparative costs of land acquisition,
- c) comparative quantified travel benefits or disbenefits,
- d) comparative numbers of properties affected,
- e) comparative environmental impact,
- f) comparative predicted traffic flows.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5141 Mr Keith Mattinson Lancashire Fire & Rescue Service** Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Received 05/10/2018:

We have no comments to make about the overarching forward plan, other than a concern about the impact of any new housing on the requirements for suitable hydrants, and specifically who will fund the installation of these.

However our main area of concern relates to the project to improve the Gyrotory system. As you are aware Rawtenstall Fire Station sits on the roundabout at the heart of the Gyrotory system, and we are extremely concerned that your proposals referenced in the Local Plan and the Highway Capacity Study potentially include a need to relocate the station.

The station itself dates back to 1989, with an accommodation block being added in 2011. Both the station and the accommodation block are in good condition and meet our current requirements (with minimal planned expenditure in the next 5 years). The location itself also provides a suitable base from which to meet our emergency response standards for Rawtenstall and the surrounding area. As such we have no need to relocate the station and are therefore concerned that your plans could result in such a requirement. We have a meeting scheduled for next week to discuss this further, but clearly if that was the case we would need re-assurance that you would identify a suitable alternative site that met our response requirements and would meet any costs of providing a new facility to the same standard as our existing facilities. Clearly this would have significant cost implications and we would expect these to be met by the Council.

Hopefully we will be able to clarify some of this at our meeting next week, following which we may be in a position to provide a further update.

Update 18/10/2018:

Further to my email below we have now held the meeting with Council Officers and wish to re-affirm our position as follows:-

The station itself dates back to 1989, with an accommodation block being added in 2011. The station meets the needs of our demand profile, with current front-line provision and associated crewing arrangements at the site aligned to this. Both the station and the accommodation block are in good condition based upon our current requirements (with minimal planned expenditure in the next 5 years). Within the scope of our Integrated Risk Management Plan (IRMP) 2017-22, Rawtenstall Fire Station has been considered most recently during the Emergency Cover Review 2017 (a strategic evaluation of our assets and front-line resources within Lancashire.). These re-affirmed that the location continues to provide the most suitable base from which to meet our emergency response standards for Rawtenstall and the surrounding area. This considers further, the requirement for Retained Duty System firefighters to respond to the site within five minutes of receiving an emergency call, and it is worth emphasising that the scope to continue doing this from any alternative site would severely limit any relocation options.

As such we have no need to relocate the station and are therefore concerned that your plans could result in such a requirement. If that was the case we would need re-assurance that you would identify a suitable alternative site that met our emergency response requirements as determined within the IRMP and would meet any costs of providing a new facility to the same standard as our existing facilities. Clearly this would have significant cost implications and we would expect these to be met by the Council.

Update 19/10/2018:

Sorry I have just looked at the Highway Capacity Report and with specific reference to the preferred options shown on page 85 we do not feel the existing fire station would be a viable under any of these. As such we would seek your earliest confirmation that, should you go ahead with your plans, you would identify a suitable alternative location and would meet the full cost of providing a new facility. Failure to do so would significantly impact on fire cover for Rawtenstall and the surrounding area.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5144 Mr Mike Dodd**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

At a recent meeting with our local M.P. Jake Berry I brought up the benefits of extending Wood Lane-(one of the exits off the gyratory above M66/A56) across to link up with Rochdale Road: approx 300 metres in length, and he appeared enthusiastic about the idea. Even though this comes under Bury Council and is not in Rossendale Borough, the benefits to the village of Edenfield would be an immediate reduction in all through traffic to and from Rochdale.

ALL HGV quarry wagons and other HGV's would be diverted through to the relief road together with all through traffic. There is no significant industry in the village which requires HGV deliveries:- it therefore has the potential to make Edenfield HGV free.

The old cottages, approaching 200 years old, have their foundations tested to the limit many times a day with the quarry wagons. Approx. 10 years ago Bury Council were required to undertake expensive repairs to subsidence on Whalley Road adjacent to the Edenfield boundary, caused in the main by the quarry wagons. The quarry was given permission around about this time to continue mining for an extended period:unsure of the length of the extension but think it may be to 2040. At this time if it is still profitable to continue mining then I would guess that an application for a further extension would be made. There is also provision for the quarry to be used as landfill as and when mining becomes unprofitable :-i.e. the problem with HGV movement is a long term problem which has been identified in an LCC Minerals and Mining report in which restrictions to movements was called for. A relief road would automatically nullify the need for restrictions.

We are told that there is a distinct possibility that up to 500 new houses may be built in Edenfield, effectively doubling the population and increasing the traffic load.

A relief road, the same width as Wood Lane and 3 to 350 metres long could work in conjunction with Bolton Road North becoming a one way road with no access from the roundabout (except buses?). Thus making traffic coming off the A56 and from Stubbins direction use the Wood Lane exit and be directed on to the relief road. Similarly, traffic coming along Whalley Road from Bury direction would also be directed to the relief road.

How much longer are the cottages able to stand the constant movement of HGV's, when there is an obvious solution to the problem? Are you able to put my points to the relevant people involved in the decision making process?

Thank you,

I actually own the land in the attachment which is classified as greenbelt land and comes under Bury Met district. From the mill adjacent to Edenfield boundary to the two semis there is a distance of around 50 metres with direct access to the field. At the top of the field adjoining Rochdale Rd. A distance of approx. 3-350 metres and is generally flat with no obstacles , I would estimate that the land rises no more than 100 foot between Rochdale Rd. and Whalley Rd. When compared to the size of the roundabout in Edenfield centre there should be more than sufficient space to construct new roundabout at this location. Obviously I am prepared to negotiate a sensible sale price should this be of interest.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5148**

Edenfield Community Neighbourhood Forum

Number of supporters:

1213

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy TR1: Strategic Transport

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy

73. Strategic Policy TR1 notes in its final bullet point that the focus will be:

“Ensuring that development that generates significant movement is located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.” Paragraph 102 of the NPPF (2018) notes that transport issues should be considered from the earliest stages, so that:

“a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”

74. The allocation of 456 dwellings within Edenfield, will generate ‘significant movement’ – particularly as a proportional increase to the 970 dwellings already located within Edenfield²⁶

75. Given Edenfield’s rural location, it is expected there will be a larger reliance on private motor vehicle usage in comparison to urban areas such as Bacup, Haslingden and Rawtenstall. Given the minimal services located within Edenfield, particularly no secondary school or doctor’s surgery, local residents are already having to travel outside of the settlement for these services. Edenfield is served by bus services, notably the X41 ‘Red Express’ bus service between Manchester and Accrington and the 481 (Blackburn to Bury), 482 (Bacup to Bury) and 483 (Burnley to Bury) bus services. While bus services during the day time are frequent, evening services are less frequent with the last bus out of Edenfield in either direction not long after 10 pm.

76. It has been noted by Edenfield Community Neighbourhood Forum during a recent community workshop for the Neighbourhood Plan (in 2018), that local bus services have been cancelled in the past due to the issues with traffic caused by on-street parking along Market Street. Therefore, it is considered that need to travel is not able to be minimised given the lack of services and that sustainable transport is not able to be maximised, due to operational issues in the past and limited evening bus services.

77. The Highways Capacity Study, which was prepared by Mott MacDonald, was supposed to be a key evidence document for Regulation 18 Draft Local Plan Consultation in 2017. This document was only made available to the public on 1st October 2018, just 4 days before the end of this Regulation 19 consultation. As such, we have not had sufficient time to review this document. Given the delay in its release, we are querying whether this Regulation 19 consultation should have taken place without the release of this vital evidence, let alone submitting a Local Plan to the Planning Inspectorate which has not been adequately evidenced or consulted on.

78. RBC however did release a Technical Note in advance of the Highway Capacity Study. The junctions of Rochdale Road/Market Street and A56/M66 Junction 0 (located within Edenfield) have been assessed. Of particular note is the Rochdale Road/Market Street junction – this has been assessed as not being able to accommodate the full fifteen years of the plan. The Technical Note did state for this junction, along with other junctions that could not accommodate the full 15 years of the plan:

“operational performance at these junctions is notably poor in both the Reference Case and Local Plan scenarios at 2024 and 2034. The poor performance is not necessarily a result of the Local Plan allocations, it is considered however that the views of LCC should be sought nonetheless.”

79. Therefore, it is not justified as to why RBC have considered proposed housing allocation H72 of this scale for Edenfield when it is likely to have poor performance as early as 2024, irrespective of the Local Plan allocations.

80. It is understood that the developers with housing land interests in Edenfield are undertaking their own assessment of impact/potential for housing to the West of Market Street at a more local level to assess the impact of potential junctions off Market Street and Exchange Street. It is understood that the RBC will not be undertaking their own study at this scale and will be accepting that of the developers. Therefore, questions should be asked as to the impartiality of these studies – questioning whether Policy TR1 has been positively prepared and appropriately evidenced.

81. Therefore, in consideration of Paragraph 102 and commenting on each of the criteria as identified above –

a) the potential impacts of development on transport networks can be addressed;

Comment: The potential impacts of development on transport network cannot be addressed without the appropriate evidence base being available.

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

Comment: No strategic level highway or public transport improvements are proposed in the proposed policy map for Edenfield.

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

Comment: No improvement has been proposed within the Reg 19 Policies Map.

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

Comment: The potential impacts of development on transport network cannot be addressed without the appropriate evidence base being available.

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”

Comment: This would only be addressed at the design and Masterplan stage – however it is not clear (due to lack of appropriate evidence base or justification) as to whether existing parking and traffic issues within Edenfield have been taken into consideration or mitigated (particularly due to the high level of existing on-street parking within Edenfield).

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

TR1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy TR1: Strategic Transport

2.102 Taylor Wimpey welcome the focus on developing the potential of the East Lancashire Railway for both transport and tourism purposes, as this would introduce a further sustainable transport mode into the area, and reduce the reliance on the private car for commuting purposes.

LAND WEST OF MARKET STREET, EDENFIELD

Policy TR1: Strategic Transport

2.89 Taylor Wimpey welcome the focus on developing the potential of the East Lancashire Railway for both transport and tourism purposes, as this would introduce a further sustainable transport mode into the area, and reduce the reliance on the private car for commuting purposes.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5176 Mr****Warren****Hilton****Highways England**

Number of supporters:

Commenting on

TR1

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Strategic Policy TR1: Strategic Transport' sets out the Council's focus upon internal and external connectivity, including enhancements to the A56 corridor to improve links to the M60/M62. The development of the "Expressway" concept to the A56 corridor is supported as part of a broader approach to creating an enhanced "Central Pennine route". It is also acknowledged that the Council wishes to continue engagement with Lancashire County Council and Highways England to identify funding and implement solutions for key junctions identified in the Highways Capacity Study. However, as previously stated only the phase one Technical Note is available, which provides commentary on the assessment inputs, model development and results from the junction modelling, and we have raised some significant concerns relating to this work.

The policy also sets out the need for sustainable transport solutions to address congestion and air pollution, to integrate transport more effectively into new developments and to ensure development that generates significant movement is located where the need to travel by private car is minimised. We welcome these proposals, especially the need to maximise use of sustainable travel modes.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5197 Mr****Marcus****Hudson****Lancashire County Council**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

2- Highways

With regards the Rossendale Local Plan and one team response I am happy to comment as below.

The Rossendale Local Plan proposes 1477 residential dwellings be delivered in the first 5 years 2019-2024 with an additional 2545 residential dwellings being provided in year 5-15 (2024-2034). This is in addition to 27.37 Hectares of new gross area employment and 5.87 hectares of re-developed employment sites.

The development aspiration of Rossendale, as identified in the developing Local Plan, will place additional demand on the highway network. It is critical to ensure that the implications of development on highway infrastructure is fully understood, to enable adequate mitigation measures to be planned for.

Rossendale Borough Council have employed Mott MacDonald to provide a number of studies and these include Technical Note 399721 001A (Employment Site Access Review) and the Rossendale Local Plan Highway Capacity Study (HCS) to support the local plan evidence base.

With regards the HCS an executive summary is found on page 2 of the study document suggests "the road network in Rossendale can accommodate the full build out of the Local Plan". Although I would not completely disagree with this statement it is obvious that a significant amount of additional work is required to mitigate the highway impacts of development associated with the Local Plan proposals. Alternatively a re-evaluation of Local Plan provision in terms of quantum of development or location should be considered.

In the document a number of junction analysis identify that the first 5 years of the Local Plan can be accommodated before mitigation measures are required. Some of these conclusions are supported and some are not. However it is not clear from the report which sites are highlighted for development in the first 5 years. Consequently it is unclear which junctions and routes are likely to be influenced in the initial Local Plan period. If available clarification on this would be useful.

Where possible development should be located where it can best utilise public transport services and sustainable transport infrastructure.

A number of the study junctions are highlighted as having existing capacity issues and consequently will result in additional congestion and potential safety concerns. Of particular concern are the safe and efficient operation of the Rawtenstall gyratory system (and associated St Marys Way corridor), Haslingden Road (Tesco) roundabout and the A681 Rawtenstall to Bacup corridor.

Junction 1 - Rawtenstall Gyratory.

As identified within the study the gyratory system is considered one of the most important junctions within Rossendale, providing connecting links to the east, west, north and south and on to the strategic road network, managed by Highways England (HE), of the A56 and M66 beyond. The gyratory itself offers significant influence to the operation of both the Tup Bridge and Asda road junctions located directly to the north of the gyratory system along the St Marys Way corridor.

Operational analysis provided within the study indicates that the gyratory will operate over theoretical capacity on the Bury Road approach in the 2019 baseline am peak, whilst other arms operate within capacity, bar A681 Bocholt Way approach which has a suggested degree of saturation of 93.3%. The evening peak highlights further capacity issues on a number of junctions in the 2019 baseline.

As would be expected the 2024 and 2034 background growth model indicates a worsening of these capacity issues. Consequently Local Plan traffic will provide significant impact on the gyratory which will require mitigation.

Another consideration is the impact of additional congestion on air quality, where the gyratory falls within an air quality management area.

Mott Macdonald have recognised these issues within the study and undertaken an optioneering exercise detailing 16 options, identified by three types:-

I. Do Minimum.

II. Roundabout.

III. Signalised Corridor.

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Of the 16 options presented, 3 have been identified as being the most eligible for consideration, one for each type. It should be noted that Highways England have questioned the validity of the modelling and Mott MacDonald are in the process of addressing the concerns highlighted by the HE.

Option 3 Do Minimum Cost Circa £900,000

Option 3 offers some benefit in terms of mitigating local transport traffic impacts. The report suggests pm Peaks are broadly similar (to base models and therefore can be considered to mostly mitigate impacts. This does appear to be the case. Unfortunately there are notable increase in the am peaks over baseline models with rises in in Degree of Saturation (DoS) and Mean Maximum Queue (MMQ) on a number of arms.

In addition option 3 appears to have a detrimental effect on the A682 St Mary's Way North Approach Ahead Right. This would be a concern.

However the proposal does have merit. Option 3, or derivative, does provide a degree of mitigation relief, does not rely on the relocation of the fire station, is low cost and consequently would appear to have potential for implementation. I would suggest that this option could be explored and developed further with a view to maximise capacity, especially with regards the identified am peak issues.

Nevertheless further consideration should be given to incorporating improved sustainable transport options within a modified design. For example the access from the gyratory towards Bacup Road could be examined as a bus (and cyclist) priority lane for feeding the new Rawtenstall Bus Station.

As presented the design does not provide any significant improvements for cyclists or pedestrians, or obvious casualty reduction benefits. These should be examined as the Local Plan develops.

Option 6 Roundabout Design Cost Circa £3.2 Million

Option 6 does not perform as well as option 1 in the base analysis, or any of the proposed alternative scenarios of congestion relief, facilitation of bus provision or public realm enhancement. The option is significantly more expensive than option 3 and would likely require the relocation or rebuild of the existing fire station.

There appears to be no benefit to further exploring option 6 as option 3 provides greater benefit at lower cost.

Option 12 Signalised Corridor Cost Circa £5.5 Million

Option 12 is a high cost option that, as would be expected, brings the greatest level of mitigation benefit to Local Plan traffic and actually provides some improvement on baseline background growth conditions for some arms of the junction. However the proposal is not a perfect solution and modelling does highlight potential issues with the operation of the Bocholt Way junctions with a predicted DoS of 183.4% and 236.9% for the am and pm peaks with subsequent severe queueing issues.

It would appear that the potential benefits over option 3, certainly in terms of congestion relief, do not seem to be of significant a level to indicate good value for money.

However other benefits, such as pedestrian access, public realm, freeing up development land etc. are evident.

Funding will undoubtedly remain a significant challenge for all proposals. The use of section 106 is unlikely to be able to fund the required infrastructure and Rossendale Borough Council does not currently operate with CIL, with little prospect of this stance altering. Consequently I would suggest Rossendale Borough Council will need to demonstrate how a chosen mitigation solution can be delivered.

No solution as presented provides complete congestion relief to the gyratory (or St Marys Way corridor). However the junction is so pivotal to the operation of Rawtenstall and the Borough as a whole then a balanced view needs to be adopted as clearly Rossendale needs to develop its Local Plan.

Consequently I would suggest that option 3 and option 12 could both be further examined in order to provide as much mitigation to the Local Plan proposals as possible. In terms of value for money and deliverability option 3 would appear the most deserving of further examination. However mitigation should be delivered sooner rather than later in the life of the Local Plan.

Junction 2 – roundabout by Hardmans Mill.

The modelling provided suggests this junction operates with significant spare capacity on all assessments, during both the am and pm peaks, including the 2034 Local Plan scenario. Consequently the influence of traffic associated with the Local Plan on this junction would not be a concern to the county council.

Junctions 3 and 4 St Marys Way Corridor

Vehicle flows through the Tup Bridge and Asda junctions are influenced by queue lengths formed from the gyratory system. However the two junctions actually run MOVA in

isolation and are not directly linked to each other or the signals on the gyratory, as is suggested in the report. Consequently the signalised junctions cannot be modified to run more efficiently. The main influencing factor is queue lengths resulting from congestion around the gyratory.

Modelling identifies that junction 3, the Asda signalised junction, can facilitate 2024 Local Plan traffic however 2034 Local Plan traffic sees significant capacity issues during both the am and pm peaks. Consequently I would agree that this indicates 5 year Local Plan traffic could be accommodated by the junction. However further growth would result in significant and severe congestion issues without the intervention of mitigation measures.

Junction 4 however is more problematic. Modelling indicates a number of arms suffering from congestion, both in the am and pm peaks, from the baseline of 2019. As would be expected these baseline issues are exacerbated in future year scenarios both baseline and Local Plan. In the am peak both the A682 Burnley Road approach and Newchurch Road approach show significant MMQ results and capacity issues for the 2024 Local Plan scenario. In the pm peak the Haslingden Old Road approach show significant MMQ results and capacity results for the 2024 Local Plan scenario. 2034 Local Plan modelling shows severe congestion on multiple approaches for both am and pm peaks.

The 2024 Local Plan modelling results indicates mitigation will be required to relieve congestion at the discussed junctions. Alternatively a carefully phased approach to the delivery of development sites which may influence these junctions will need to be implemented to ensure the safe and effective operation of the highway network at this location.

Junctions 5a – Haslingden Road, Tesco's Roundabout

The 2019 baseline scenario indicates a number of arms of the junction are approaching capacity, which is exacerbated in the 2024 reference case with the A681 Haslingden Road approach to exceed capacity in the evening peak.

The study highlights that the difference between the 2024 reference and 2024 Local Plan is minimal. Although this is recognised we do have concerns regarding the increase in predicted queue lengths along A681 Haslingden Road in the pm peak. Nevertheless it seems likely the junction operation will permit 2024 local plan delivery.

The 2034 Local Plan scenario indicates theoretical capacity being exceeded and significant queue lengths and congestion on a number of approaches during both am and pm peak periods. Included within this is the A56 off-slip managed by Highways England (HE) which would have potential operational and safety concerns for the effectiveness of the A56 eastbound route.

Mitigation measures will undoubtedly be required for the operation of Junction 5a, or a reduction in delivered development which influences the junction.

A number of mitigations options have been explored by Mott Macdonald as part of the report.

Option 1 provides a left turn free flow slip road from A680 Manchester Road to A681 Haslingden Road. I would have safety concerns regarding pedestrian / vehicular conflict as the slip road passes the existing signalised pedestrian crossing. If this proposal is pursued a close examination of the interaction between pedestrians and vehicular traffic will be required, including an assessment of pedestrian desire lines.

Option 2 provides a flare from A56 off-slip which provides additional capacity on the approach to the junction. I would have no objection to this in principal however it should be noted that there is an informal pedestrian desire line across the junction. The A56 off slip is managed by Highways England (HE) and I would expect comment will be provided on this proposals.

Modelling is provided for both options along with details of a hybrid of the two. However none of the options presented provide an ideal solution. In each case capacity is exceeded with subsequent queuing issues for the 2034 Local Plan scenario. However the hybrid solution most closely mirrors the 2034 reference case scenario. On this basis it appears further work would be required to mitigate the impacts of Local Plan traffic on the junction or limit the level of development coming forward which may impact the junction. However a development of the hybrid solution seems to be the most logical progression.

Junctions 5b – A56 Haslingden Roundabout

Modelling of junction 5b indicates that for the 2024 reference case the junction operates within capacity for all approaches and can accommodate Local Plan traffic. This view is accepted. Modelling for the 2034 Local Plan scenario indicates a worsening of the operation of the overall junction. Consequently mitigation measures are proposed.

The junction is further discussed in chapter 6 of the study where mitigation solutions are offered. The junction facilitates access from / to the A56 and the mitigation strategy will likely influence movements along the strategic route. Consequently Highways England (HE) may offer concerns regarding this issue as part of their comments to the study.

Junction 6 – Rising Bridge

Modelling results indicate that a number of approaches are operating close to the theoretical capacity at the 2019 baseline. All future scenarios, including baseline and local plan, show capacity issues.

The outputs produce suggest that the local highway network, managed by Lancashire County Council can accommodate the first 5 years of Local Plan growth up to 2024. This could be acceptable to the county council. However mitigation will be required to accommodate the following 10 years of Local Plan growth between 2024 and 2034, or a reduction in development to come forward which may influence this junction. This is due to both Blackburn Road approaches to the roundabout exceeding theoretical capacity in either the am or pm peaks period with the inclusion of Local Plan traffic.

The A56, including the signalised roundabout, form part of the strategic highways network managed by Highways England (HE). Modelling indicates a number of capacity issues on the strategic network. HE will likely provide feedback on these issues, however any mitigation proposals put forward will need to carefully consider the impact on the local highway network links from Blackburn Road (both sides).

Junction 7 – Todd Hall

This junction is a simple left in left out from / to the A56. Modelling indicates no significant queueing or capacity issues along Todd Hall Road which is within the jurisdiction of Lancashire County Council. Consequently the operation of the junction would not be a concern to the council. However we are aware that the junction feeds in to traffic which can queue along the A56 during peak time. Consequently HE may offer concerns regarding this issue as part of their comments to the study.

Junction 8, 9a and 9b Grane Road Corridor

The junctions have been modelled using VISMM software unlike other junctions which have utilised PICADY software for modelling. The report highlights this deviation from study methodology was required because the initial assessment did not adequately reflect on-site behaviour.

The modelling results indicate that all junctions operate satisfactorily in all assessment scenarios.

The report further clarifies that average speed traffic cameras will have a moderating effect on vehicle speeds along Grane Road which will provide a positive effect in terms of traffic management and control.

Our view is that the operation of junctions 9a and b (Grane Road / A56) are likely to offer adequate capacity to facilitate traffic associated with the Local Plan.

However we do not agree with the assessment that junction 8 (Grane Road / Holcombe Road) can provide adequate capacity to facilitate development traffic. Peak time vehicle movements along Grane Road result in it being extremely difficult to undertake turning movements out of Holcombe Road, especially for right turning vehicles heading towards the A56. Consequently although MMQ may not be particularly significant, delay can still be considered severe. The council has also received complaints that the moderation of vehicle speeds along the Grane Road corridor has resulted in fewer gaps for emerging traffic to utilise. Although anecdotal in nature this does add additional weight to concerns. Our view is that mitigation will be required in the form of controlled junction operation in order to facilitate development in area of Grane Road and Holcome Road and this view should be extended to inclusion within the Local Plan.

Junction 10 - A56 / M66 Junction 0, Edenfield

The modelling provided suggests this junction operates with significant spare capacity on all assessments, during both the am and pm peaks, including the 2034 Local Plan scenario. The amount of indicated junction capacity within all scenarios means the influence of traffic associated with the Local Plan on this junction would not be a concern to the county council.

Junction 11 - Rochdale Road / Market Street / Bury Road, Edenfield

The modelling results provided for the junction indicate that the Bury Road (south) approach will be approaching theoretical capacity by the 2034 reference in the evening peak. All other approaches will operate with some, albeit limited, capacity. The model corroborates the proposal that the first 5 year of the Local Plan can be supported. However the information provided shows that the influence of Local Plan traffic on the junction will see all arms operating over theoretical capacity in either the am or pm peak.

I would suggest that a mitigation proposal should be developed for the junction to facilitate Local Plan traffic. Alternatively the quantum of development should be reduced and modelling undertaken for the junction to identify the amount of development which can realistically come forward based on the existing junctions operation (or a hybrid of the

two). I would suggest in order to be thoroughly robust the model should assume 100% distribution through the junction.

Junction 12 - St James Square, Bacup

Mott MacDonald have taken account of the proposed townscape heritage initiative works for this junction. They have utilised the county council's AIMSUN model and output maximum virtual queue (MVQ) plots and delay plots. The modelling provided suggests Local Plan traffic will result in an increase in queues and delays over the reference position. However impacts are unlikely to be significant. Consequently the influence of traffic associated with the Local Plan on this junction would not be a concern to the county council.

Junction 13 – Waterfoot Roundabout

The operation of the A681 Rawtenstall to Bacup corridor is of concern. The route suffers from severe congestion during operational peaks, as highlighted within the study model which shows the Waterfoot roundabout junction operating over capacity in both the am and pm peaks for the 2019 baseline model. The influence of Local Plan traffic results in additional congestion issues with significant queue lengths forming in both the 2024 and 2034 Local Plan scenarios. The pm peak shows queue lengths of 267 (177 ref) in 2024 and 526 (227 ref) in 2034 along Bacup Road (west). I would not consider the difference between the base and Local Plan models to be "marginal" for the 2024 forecast year as suggested in the study. Likewise it is not agreed that the evidence suggest that 2024 Local Plan traffic can be accommodated by the junction.

The 2034 local transport impacts are significant and will likely have a severe impact on journey time reliability along the route.

The study offers the suggestion that "it could be argued that because the junction is failing in the 2034 Reference Case scenarios that no further consideration of the junction is required". This view should not be supported. The operation of the junction as presented at the 2034 reference case is significantly better than modelling suggest for even the 2024 Local Plan scenario which clearly indicates the major impact that Local Plan traffic will have on the operation of the junction, including journey time reliability along the corridor.

The junction is further discussed in chapter 6 of the study where mitigation solutions are offered. A proposal is provided to re-signalise the junction with modelling provided in table 64. The original change from a signalised junction to a roundabout operation had strong political support and has been seen as a beneficial measure for access along the route. It is unlikely that returning to signals would be supported and would no doubt be viewed as a retrograde step by the travelling public. The modelling indicates that should the mitigation measures be introduced and a return to signals is implemented the 2034 pm peak will still operate over capacity. The HCS does identify that the mitigation does not provide required capacity for the peak period but seeks to equalise queue lengths across the three arms of the roundabout.

It should be noted that there have been a number or recorded personal injury accident (PIA) collisions at and within close vicinity to the junction. Congestion along the corridor is likely to be a contributing factor to the number and frequency of PIA's.

It is unclear from the HCS report that congestion along the A681 can be adequately mitigated against. As highlighted within the study the corridor is extremely constricted by existing development and topography. Consequently adequate mitigation may be extremely difficult to implement. Consideration should therefore be given to limiting the number of development sites which feed into the A681 corridor. We should consider it essential that mitigation measures in terms of reducing car dependency and promoting sustainable travel options be explored. For example linkages to the Valley of Stone cycleway and improvements to the route from and through potential development sites.

Junction 14 – Toll Bar, Stacksteads

The comments provided for junction 13 (Waterfoot roundabout) above are also valid for the Toll Bar roundabout which is also situated along the A681 Rawtenstall to Bacup corridor. Modelling indicates the junction will operate over capacity in the 2019 baseline scenario with significant impacts when adding Local Plan traffic. Mitigation is proposed in the form of signalising the junction, however as per junction 13 the mitigation does not provide the necessary capacity to facilitate local plan traffic.

It should be noted that there have been a number or recorded personal injury accident (PIA) collisions at and within close vicinity to the junction. Congestion along the corridor is likely to be a contributing factor to the number and frequency of PIA's.

As above (junction 13 comments) it is unclear from the report that congestion along the A681 can be adequately mitigated against. As highlighted within the study the corridor is extremely constricted by existing development and topography. Consequently adequate mitigation may be extremely difficult to implement. Consideration should therefore be given to limiting the number of development sites which feed into the A681 corridor. Mitigation measures in terms of reducing car dependency and promoting sustainable

travel options should also be explored as a necessity. Again I would highlight the example of linkages to the Valley of Stone cycleway and improvements to the route from and through potential development sites.

Junction 15 – Market Street, Shawclough

The modelling provided suggests this junction operates with significant spare capacity on all assessments, during both the am and pm peaks, including the 2034 Local Plan scenario. Consequently the influence of traffic associated with the Local Plan on this junction would not be a concern to the county council.

With regards individual sites obviously the larger development sites will be subject to a full transport assessment and travel plan in accordance with National and Local Policy and the evidence collected in the Highway Capacity Study . The Highway Authority will seek a detailed design to determine the impact upon the highway network and any mitigation measures will be investigated by the developer.

The sustainability of all sites will be a key consideration for the council as the highway authority and improvements to local public bus services and infrastructure will be requested where necessary. Existing Public Rights of Way must be integrated into any development and improved where necessary. Internal road layouts in accordance with Manual for Streets (MfS) (and Creating Civilised Streets) will be essential to maximise permeability onto the highway network with high quality pedestrian and cycle links to maximise sustainability.

The site allocations plans that we have examined for residential development have not provided details of potential access points onto the highway network so some assumptions have been made where connections exist or could be made within the land highlighted on the plans.

We have provided specific comments on a number of sites as detailed below:

Please see specific sites

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 8

Comments on policy TR2 Footpaths, Cycleways and Bridleways

Reference **5018** **Brian Michael** **Kathy Fishwick** **Rossendale Civic Trust** Number of supporters:

Commenting on TR2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support TR2 where Although Rossendale has the densest public rights of way network in Lancashire, much of the network is in a poor condition and there is an identified need to develop, extend, upgrade and improve access to the network.

However RCT see need to note the legacy of Lancashire County Council, and Rossendale Groundwork's creation of many new pedestrian, cycle and horse riding routes, such as Alan Fishwick Way, Lench Valley Cycleway, Cloughfold Greenway, often from "free money" grants from Countryside Commission, and which are not part of the LCC network, and which should be under the same management structure. This might ultimately require "hard choices" to achieve a well maintained core network.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5153 Mr Chris Peat Forest of Rossendale Bridleways Association** Number of supporters:

Commenting on

TR2

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

5 October 2018

Dear Sirs

I wish to comment on the Local Plan for Rossendale, in particular, the poor provision for horse riders, and total lack of acknowledgement of their existence beyond a list of “don’t” as regards the building of stables.

Rights of way network and development

No reference is made to the fact that out of the 400 plus miles of rights of way in Rossendale, only approximately 30 miles is legally available to horse riders. The roads are simply not safe to ride on these days and yet horse riders have no choice if they wish to ride out. There must be ample opportunity to create more bridleways under S 106 agreements when developers submit planning applications, but we never hear of any.

Another problem with continued development is that bridleways are frequently tarmacked by developers, which puts horse riders back on the road with fast moving traffic. Again, unless it this is flagged up by a watchful member of the public, no steps are taken to prevent bridleways being swallowed up by development.

Improvements to the rights of way network

Policy TR2 to support the development and enhancement of a strategic PROW network. When NCN route 6 was first discussed the idea was to tarmac all the disused railway lines that had been used by horse riders as a safe corridor. Horse riders objected, the latest objection at Stacksteads where a brand-new surface, stone to dust, was to be torn up and replaced with tarmac. HORSES FALL OVER ON CHEAP TARMAC USED ON RIGHTS OF WAY.

The Local Plan at first sight seems to be catering for horse riders, but actually NOTHING has been done for this group unless we have held demonstrations, site meetings etc to make our point. Are all the five routes mention in TR2 intended to be multi user? If not, why not? If any routes are to be made horse friendly, PLEASE consult the local bridleways group or the BHS as often gates and barriers, surfaces etc are often NOT horse friendly and accidents occur.

Page 111 Explanation:- The Borough’s public footpaths and cycleways are a valued recreational resource which form an essential component of Rossendale’s Green Infrastructure network resource and

play an important role in linking the settlements to the nearby countryside.

Firstly, there is no such legal status as “cycleway” on the definitive map. Cyclists have to use bridleways. Horse riders need to be catered for as well as walkers and cyclists.

Mention is also made of health benefits, but has the Plan looked at the Health Benefits of Riding, a study undertaken by the British Horse Society? The study showed that riding and horse related activities such as grooming, mucking out etc are as good as a work out at the gym. The study showed that the majority of riders (90%) are female and more than 37% of those are above the age of 45. These women responded that they would probably not take any form of exercise if they didn’t ride. Yet still horse riders get no recognition or extra provision within the rights of way network.

This section goes on to mention the need for improvements to the rights of way network, but no mention is made of horse use, all the way through its “cyclists and pedestrians”. Many of the ancient highways - routes we have ridden for decades, are legally defined as footpath as the definitive map is incorrect. The complicated legal

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process required to correct these mistakes has fallen on overstretched volunteers. But time is running out as the cut-off date for upgrade applications using historical map evidence is 2026. Twenty years ago, a planning officer called John Elliman understood the sorry state of bridleway provision in the borough and worked hard on our behalf create more miles of riding routes, such as the Riverside route in Stacksteads, the disused railway line in Stacksteads, the Britannia Greenway and others, but sadly John retired some time ago and no one in the planning office seems to know about bridleways. None of the routes created by RBC in the early 1990s were recorded properly, and although we have ridden them since they were created, when LCC took over the maintenance of rights of way, we were told we would have to put in DMMO applications if we wished to continue riding them! I have worked hard over the last few years to attend to these applications by collecting user evidence but how helpful it would have been to the riding fraternity if the paths were dedicated by the council when they are on council land. Cyclists and walkers are catered for with miles of paths to choose from and you could probably count on one hand the number of applications they have made between them.

Horses and the local economy

There are approximately 3000 horses in Rossendale, and a survey undertaken nearly 10 years ago showed that it costs the average horse owner £4,500 a year to keep their horse. Does the council realise that equates to £13,500,000 a year straight into the local economy? Horses have to be fed, housed, shod, and expenses that aren't included in the survey were how much riders additionally spend on expensive tack, clothing and other equipment, or the running of a horse box or trailer of some kind to take their animals to shows etc. Farmers can't make a viable living these days from traditional farming, and many have diversified into livery for horses. But where are the facilities in terms of riding routes from these yards for these horses to be exercised on? The plan mentions:

“Stables and associated infrastructure should be sited with safe and convenient access to the local highway network and, where possible, direct connections to the local bridleway network.”

Which network is that? The 30 odd miles of bridleway in Rossendale that doesn't link up and probably goes nowhere near the yard where the horse is kept? Mention is also made of an adequate standard of welfare for horses – this must include safe off-road routes for horses to be ridden on to provide suitable exercise, particularly in the long winter months when turn out is limited to preserve pasture. Given that there are 3000 horses in Rossendale that are ridden on average 5 miles a day, 5 days a week, that equates to 75,000 miles of riding in a year on 30 miles of bridleway. And yet Policy LT5 states: existing bridleways should not become over-intensively used as a result of the development; Can you see the irony of that statement?

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Comments on policy TR3

Road Schemes and Development Access

Reference **5018**

Brian Michael

Kathy Fishwick

Rossendale Civic Trust

Number of supporters:

Commenting on

TR3

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support TR3, but must note the recent permission for a bungalow that would prevent the linking of Hollins Way, a mid 1960s Spine Road intended to serve developments from Burnley Road to Newchurch Road. But those were the days: when infrastructure was done first as at Runcorn New Town, and in the early years of Warrington New Town.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section 1

Comments on policy TR4

Parking

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

TR4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

RCT support TR4 and note that Residential Garages will not be counted towards parking provision figures unless suitable evidence is provided. A creative approach should be taken to residential parking design building in principles in "Manual for Streets" (2007) to ensure that layouts are not car dominated.

However this needs to state – unless at least 3 metres internal width. Gradients of parking spaces in many developments are irresponsibly too steep, and where located running down to key access roads, such as Hollins Way; the Council should be prepared to accept their past actions by providing grants to remodel, closer to level, such private parking areas.

Rossendale Civic Trust support TR4's retention of Core Strategy parking standards, but note some inequalities in Rossendale's Public Car Parking, and, see below, have specific objections to present policies affecting Bacup.

Areas and Numbers. - 2 February 2013

Core Strategy Parking Standards for A1 Retail with accessibility reductions:

Food: 1 Space / 15 - 22sqm

Non Food: 1 Space / 21 - 31sqm

Bacup*

116 Long Stay – 117 in 2014 + 91 On-street = Total 208

Net Retail less Coop and Morrisons 4095sqm

35sqm / Off-road Space

20sqm / Off-road + On-street Space.

Crawshawbooth

7 Long Stay + 13 Short Stay = 20

Net Retail 899sqm

45sqm / Space

Haslingden

168 Long Stay + 66 Short Stay = 234

Net Retail less Winfields, Coop and Holden Wood 5982 sqm

26sqm / Space

Rawtenstall

285 Long Stay + 136 Short Stay = 421

+ On-street 118 = Total 539 Spaces

Net Retail Primary and Secondary less Lidl and Focus 8877sqm

21sqm / Off-road Space

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65 sqm / Short Stay Off-road Space
16/17sqm / Total Space
35 sqm / Total Short Stay and On-street

Waterfoot

94 Long Stay + 34 Short Stay = 128
+ On-street c60 = Total 188 Spaces
Net Retail 3129sqm
24 sqm / All Off-road Space
92 sqm / Short Stay Off-road Space
17 sqm / Total Space.
33 sqm / Total Short Stay and On-street

Whitworth

83 Long Stay
Net Retail less Coop 1114sqm
13sqm / Space

*RCT note comments on Bacup THI's Public Realm 2014. RCT did not see the complete replacement of St James Square's present working highway layout of sufficient priority to spend a reported £400,000. Bacup, unlike other shopping centres in Rossendale, has less car parking: c96 to Rawtenstall's c529, and far less in relation to number and size of its shops: 1/43sqm to Rawtenstall's 1/16-17sqm of net retail floor area, and no Short Stay Car Park close to its centre.

Now with a large supermarket and its 132+ space car park on the edge of the town centre, the town centre shops are at a disadvantage. The best way to conserve Bacup's historic town centre is to have successful traders. A need, as set out in the 2011 approved local plan, "Town centre parking in Bacup and at key visitor locations will be provided and improved".

Our members also had concerns about the suitability of "shared space" at well over national guidance of 100 vph, and we gave detailed comments on the concept design for St James Square, and where we saw a need for some changes in priorities. Not very sustainable.

3. Rossendale Infrastructure Delivery Plan August 2018.

Rossendale Civic Trust shares the view given in its :-

Executive Summary

Much of the infrastructure in Rossendale, as in many parts of the country, dates from the Victorian era and has been progressively added to as new development comes forward. While utilities have an ongoing maintenance programme, additional growth brought forward by the Plan will necessitate new infrastructure investment. Much of this will be required on a case by case basis as new development comes on stream.

RCT has summarised the text and sees some key issues in bold, where present capacity ought to affect where and when development should take place.

A. Education

Currently LCC have indicated they are not actively looking for additional secondary schools sites and continue to monitor the housing to be brought forward to understand the impact across secondary schools in Rossendale.

Current data provided by Lancashire County Council School Planning Team indicate that there is a projected shortfall of primary school places across the Rawtenstall and Ramsbottom areas within the next 5 years of the local plan.

LCC have indicated that if the planned level of development proposed at Edenfield goes ahead they may require either a school extension or a new school. The cost of a new School would be in the region of £4 million.

Secondary schools currently show a surplus across the district, Fearn's is the main High School with available space. Currently LCC have indicated they are not actively looking for additional secondary schools sites and continue to monitor the housing to be brought forward to understand the impact across secondary schools in Rossendale.

There is no additional need for Sixth Form provision within the local Plan as it is anticipated there will be sufficient spare capacity across the district and beyond.

RCT NOTE where's Accrington and Rossendale College after sale and exit from its site in Rawtenstall, and withdrawal from motorcycle maintenance training in Bacup.

B. Transport

The valley nature of the Borough and the high degree of urbanisation along main roads means that there is little option for widening or making junction improvements to the existing network.

Significant congestion occurs in the peak periods around Rawtenstall especially on the Gyrotory which is expected to reach capacity by 2023; at the bottom end of Bank Street and at Tup Bridge junction. Waterfoot roundabout and Toll Barr, Stacksteads are also sites of significant congestion.

Current projects being undertaken by LCC as Highway Authority include roadworks as part the Townscape Heritage Initiative (THI) for Bacup, notably around St James Square. The local road network links into the Strategic Road Network (SRN) which in the case of Rossendale is the A56/M66 corridor. It suffers from peak hour congestion and lack of resilience when any blockages occur. Performance is forecast to continue to deteriorate over the Plan period.

A56/M66 Corridor Study –The A56/M66 is of strategic importance to the Borough as it forms the key link between Rossendale and Manchester, the Regional Centre plus the M60/M62. It is also the main corridor for accessing the rest of East Lancashire.

The lack of a link to the national rail network is perceived by many local people and businesses as a constraint on the growth potential of the Borough. The Jacobs Study indicated that an investment in excess of £50 million would be required to bring forward a functional rail link together with the need for an ongoing annual subsidy in excess of £500 000. It is recognised that this is a long term project over the life of the Plan.

The Study recommended.....Improvements at Rising Bridge by signalling the roundabout there have recently been completed by Highways England. Full grade separation between the A56 and the Accrington-Haslingden road (i.e. a bridge) will be expensive (£30-40 million) and unlikely to score highly enough to feature in the next national Roads Investment Strategy 2020-2025

There is currently no proposal for upgrading the M66 to a Smart Motorway. However the route is one of those being looked at in the Transport for the North (TFN) Central Strategic Corridor Study which will feed into the overall TfN Strategic Plan. This Study is now due to report back in Autumn 2018 with the Strategic Plan being published in early 2019.

Highways England would be likely to resist the construction of new accesses onto its network in Rossendale in line with Circular DfT Policy Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development'.

There are geotechnical issues with the A56 embankment in Edenfield that would need to be addressed in any adjacent development proposals.

Rossendale Highway Capacity Study

Mott MacDonald was employed by Rossendale Borough Council to undertake a Study of 15 key junctions in the Borough to identify if they were capable of accommodating Local Plan induced traffic growth. Stage 1 of the work identified which junctions were likely to reach operational capacity on one or more of their arms within the Plan period due to Local Plan induced growth.

Those junctions which were examined in detail in Stage 2 were:

- The Gyratory in Rawtenstall and associated junctions on St Mary's Way
- The A56 roundabout at Bentgate, Haslingden
- Tesco Haslingden roundabout
- Rising Bridge junction A56 (marginal as to whether Local Plan derived)
- Waterfoot
- Toll Bar, Stacksteads
- Edenfield

The Gyratory is expected to be able to function acceptably in the first five years of the Plan but beyond that intervention would be required if Local Plan development proposals are to progress. Addressing the issue of the Gyratory is therefore essential for years 5-15 of the Local Plan Housing Trajectory.

Anything other than a "do minimum" option is likely to be a major scheme bid of in excess of £10 million including the cost of relocating the Fire Station.

The schemes at Edenfield, Toll Bar and Waterfoot are challenging to implement because of the constrained urban environment. All the junctions are likely to become at capacity towards the end of the Plan period. Further work is being undertaken by the developers' consultants to look at options for Edenfield. The most difficult junction to address is Toll Bar which is likely to

require a comprehensive approach wider than highway interventions to operate satisfactorily.

The results of the Study are currently being discussed with Lancashire County Council and Highways England to ensure that the analysis and solutions identified are acceptable to all parties.

RCT note, more capacity in West and even East Rossendale, and maybe a need to consider their locations as more suitable for traffic generating growth than those that need an expensive relocation of the Fire Station for a rebuilding of the Rawtenstall Gyratory

RCT also note "final" issue of this capacity study was 1 October 2018.

Access to employment sites study to identify potential access points to proposed employment sites is currently ongoing.

Cycling

East Lancashire Strategic Cycle Network...obtained £3.5 of Government Growth Fund money as well as match funding in excess of £1 million from Lancashire County Council..... upgrading National Cycle Route 6 from the border with Bury at Stubbins to the border with Hyndburn at Rising Bridge and the "Valley of Stone Greenway" from Rawtenstall station to Rochdale. Both these routes use significant lengths of former railway line and deliver significant health and tourism as well as transport benefits.....complementary cycle routes are proposed which would be implemented post 2020:-

- Valley of Stone – NCR6 link - £520 000;
- NCR6 – Haslingden town centre - £69 000
- Valley of Stone – Bacup town centre £452 000; and
- Rawtenstall railway station – New Hall Hey retail park - £100 000
- Rawtenstall-Dunnockshaw –not available

Air Quality Management Areas have been declared at Bacup Road/Bury Road junction in Rawtenstall and Haslingden Sykeside roundabout due to NOX emissions from vehicles. A Management Plan has been developed and Rosso Bus has purchased a number of low emission vehicles which help to reduce the impacts.

C. Utilities

Water and sewerage

current investment period for United Utilities is the period 2015-2020. The next investment period will be 2020-2025.....outcome of the bid may impact on investment in

strategic infrastructure that traverses the Borough.

Water. no principle concerns regarding proposed developments.... full impact of any development proposal cannot be fully determined until more details are known..... supply of water required.....dependent on nature of the industry and occupier.

Wastewater, important to know whether foul and surface water will connect to the public sewer..... may be necessary to coordinate.....development with infrastructure improvements through planning condition.....cumulative impact of development can be different in reality as a result of windfall sites.

Reservoirs include the Grane Reservoirs near Helmshore; Clowbridge near Loveclough; Cloughbottom above Water and Cowm in Whitworth, which supplies Rochdale; and Cowpe Reservoir near Waterfoot.....their associated water catchments are an important resource for Rossendale and beyond.....importance of managing the impact on water catchment land will be relevant in the consideration of future development proposals on catchment land, such as wind farms.

Water trunk mains are significant assets that will need to be carefully considered if they are within or near to a development sites both in terms of the construction process and in terms of the layout of a development site.

Irwell Vale Waste Water Treatment Works serves the whole Borough.....no in principle concerns with the growth proposed within Rossendale at the wastewater treatment works for the forthcoming investment period for United Utilities.

Importance of prioritising the use of Sustainable Drainage Systems (SUDS).....to manage the impact on both public sewers and watercourses.....importance of applicants engaging in early dialogue with both the lead local flood authority and United Utilities and giving full consideration to how they can ensure the most sustainable approach to drainage is secured.

Managing flood risk is a significant issue in Rossendale.....floods of 2012 and 2015. Environment Agency has identified five culverts that most need attention.....Greave Clough and Spodden North are the highest scoring culverts.....also considering further flood risk alleviation measures in the Irwell Vale area.

Electricity

Specific development proposals within the Rossendale area are unlikely to have a significant direct effect upon National Grid's electricity transmission infrastructure. The local electricity supply network is operated by Electricity North West. The network is generally performing adequately but there are a number of substations which are operating at capacity, e.g in Edenfield and which will require enhancement before more major development can be accommodated.

Gas

A high pressure gas pipeline....runs through the west of the Borough with a governor to the south of Helmshore.....runs roughly parallel to the A56 before leaving the Borough north of Rising Bridge. There are no known plans to enhance the network in the Borough but routine maintenance may be required.

Telecommunications.

Openreach.....is committed to upgrade cabinets without high speed

broadband where more than 30 new houses would link into it or where they are approached by the local community via Community Fibre Partnerships.....working on delivering high speed rural broadband as part of a wider programme known as Broadband Delivery UK.

Mobile reception.....significant gaps in coverage...exacerbated by the topography...Whitworth area for the Vodafone/O2 network and Stacksteads for EE. Mobile operators have short term rolling plans for improving coverage, including the construction of new or higher masts

Health.

GP practices would be full in the first five years of the Plan.....greatest pressure of growth on Bacup and Rawtenstall.....Ramsbottom were the proposed growth of Edenfield to progress.....CCG's in both Bury and Rochdale report anticipated capacity pressures on their services within the first five years of the Plan.....ability to expand physically to accommodate growth.....NHS would provide up to 75% of the necessary finance the remainder needs to be met by the practice itself.

There are 7 dentists within Rossendale. 4 of these are currently willing to take on additional NHS patients.

There are no Hospitals within Rossendale.....Accident and Emergency..... Blackburn....Burnley Fairfield in Bury and Rochdale Hospital also perform complementary roles in

parts of the Borough.....locality wide services....Rawtenstall and Bacup Primary Care Centres.

Mental health.....significant issue in Rossendale.....Lancashire Care NHS Trust

Lancashire County Council plays a major role in delivering adult social care alongside the CCG. Delivery of this function is facing financial pressures.....affect both the provision of new facilities and the quality of care.

Emergency services

North West Ambulance Service....base in Stacksteads...no identified need for expansion or substantial change

Lancashire Police.....Waterfoot.....shut the public counter....a “drop-in” base for staff with services managed from Burnley.....medium term... facility may be subject to review.

Fire.....no current plans to alter facilities.....need to improve.....Gyratory.....expensive signalised option = relocation of fire station.....£4.5 million.

Community Facilities

Libraries review in 2018....Crawshawbooth Library has now Independent Community Library...

Bacup and Whitworth Libraries along with Rawtenstall and Haslingden will be retained.

Community Centres

- Crawshawbooth Community Centre
- Edenfield Community Centre
- Haslingden Link and Children’s Centre, Bury Road, Haslingden
- Whitewell Bottom Community Centre
- The Maden Centre, Bacup
- The Riverside, Whitworth
- The Doals, Weir

Lancashire County Council runs Youth Club facilities at The Old Fire Station in Rawtenstall and Market Street in Whitworth.

Sports Facilities

Leisure Centres at Haslingden and Marl Pits in Rawtenstall plus Whitworth Swimming Pool....future investment priorities.....discussed with key partners Sport England and Lancashire

Sport.....other Sports Facility providers...Fearn’s High School...Whitworth High School....Haslingden and Rawtenstall Cricket Clubs.....Council.....Playing Pitches at a number of locations.....Maden Recreation Ground in Bacup.....Playing Pitch Strategy....key locations.

Rawtenstall Ski Slope is a Community Interest Community.....investing in new facilities.

RCT note aims: discussed with key partners, and then see how Lancashire County Council have asked Pugh on 18 October 2018 to auction the ex Alder Grange Playing Field, that’s labelled RA in this Local Plan Consultation, with a reserve of £20k.

4. Conclusion for Rossendale Civic Trust has to be to congratulate the Forward Planning Team and their colleagues for their substantial and detailed production of this 2018 stage of the Rossendale Draft Local Plan

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5157 Ms Joanne Harding Home Builders Federation** Number of supporters:

Commenting on TR4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy TR4: Parking

Policy TR4 is not considered to be sound as it is not effective for the following reasons:

This policy also expects development to incorporate charging points for electric vehicles where the Council considers it appropriate to do so. This appears to be an unnecessary repetition of the policy above. It is suggested that this expectation is removed from either policy TR4 or ENV6. As set out in the response to Policy ENV6 the HBF considers it would be appropriate to add an element of flexibility to this policy.

Do you wish to participate to the Examination In Public? **Yes** Reasons

Reference **5173 Taylor Wimpey** Number of supporters:

Commenting on TR4

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

Policy TR4: Parking

2.103 This policy requires compliance with the parking standards set out in Appendix 1. However, Appendix 1 sets out maximum standards (with some exceptions) which are no longer supported by government policy following the written ministerial statement, entitled 'Planning Update March 2015', which states that:

"Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network."

2.104 Therefore, unless such justification is provided it is recommended that the maximum standards provided in Appendix 1 should be deleted.

LAND WEST OF MARKET STREET, EDENFIELD

Policy TR4: Parking

2.90 This policy requires compliance with the parking standards set out in Appendix 1. However, Appendix 1 sets out maximum standards (with some exceptions) which are no longer supported by government policy following the written ministerial statement, entitled 'Planning Update March

2015', which states that:

"Local planning authorities should only impose local parking standards for residential and nonresidential development where there is clear and compelling justification that it is necessary to manage their local road network."

2.91 Therefore, unless such justification is provided it is recommended that the maximum standards provided in Appendix 1 should be deleted.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 3

Comments on policy	Transport	Transport
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Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Policy TR1: Strategic transport

9.58 No comments at this stage though Peel reserves the right to provide comments as part of the Local Plan examination

Policy TR2: Footpaths, cycleways and bridleways

9.59 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Policy TR3: Road schemes and development access

9.60 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Policy TR4: Road schemes and development access

9.61 No comments at this stage, though Peel reserves the right to make further comments as part of the Local Plan Examination.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Number of comments in this section 1

OTHER COMMENTS

Duty to co-operate

Comments on policy	Duty to co-operate	Duty to co-operate
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Reference	94 Mrs	L	Bower	-	Number of supporters:
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Commenting on - HS1

Is the Local Plan legally compliant? No	Is the Local Plan sound? No	Does the Local Plan complies with the duty to co-operate? No
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3. Failure to meet the Duty to Co-operate

3.1 Our objection to Policy HS1 raises a failure in the Duty to Cooperate.

3.2 The Duty to Co-operate Statement Incorporating Statement of Common Ground is dated August 2018. Paragraphs 5.3 to 5.5 state:

“5.3 Housing Market Areas and Objectively Assessed Housing Need To a large extent the Housing Market Area for Rossendale can be described as being self-contained, albeit that the level of containment at 61% falls below the recognised threshold that 70% of local moves are contained, as advocated in Government guidance, and which is commonly accepted. Despite a number of alternative scenarios being devised, none of the alternative HMA areas produced a self containment level that was significantly higher than using the Borough boundary alone. The results of the SHMA analysis were shared with adjoining authorities and they have agreed that for the purposes of meeting housing requirement the best geography to use for the Rossendale HMA coincided with the Borough boundary.

5.4 Nevertheless Rossendale has strong links and high inter-dependency with the adjoining Boroughs. These are particularly apparent with Rochdale and Bury, reducing in order of magnitude with Hyndburn, Burnley and to a lesser extent Manchester city.

5.5 All the adjoining districts were happy to support using the Borough boundary for the definition of the Housing Market Area, and for which the Objectively Assessed Need (OAN) for housing would be assessed.”

3.3 It is clear that the Duty to Co-operate has been predicated on meeting an Objectively Assessed Need arising from the SHMA. As set out in our objection, Policy HS1 has departed from the SHMA and is not proposing an OAN. Instead it is applying the standard methodology (in its draft form). There is no evidence that the implications of the standard methodology has been discussed with other authorities or indeed a full understand of the implications of the standard methodology on those other local authorities as to whether that may have an impact on Rossendale.

3.4 Therefore there has been a failure in the Duty to Co-operate.

-
Do you wish to participate to the Examination In Public? **Yes**

Reasons **Our conclusion that the plan has failed the Duty to Co-operate requires attendance at the Examination.**

Number of comments in this section 1

Evidence Base

Comments on policy Evidence Base Evidence Base

Reference **5176 Mr****Warren****Hilton****Highways England**

Number of supporters:

Commenting on

Technical note on Phase One of the Highway Capacity Study

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Highways England Comments - Technical Note on Phase One of the Highway Capacity Study, January 2018

The Rossendale Local Plan Highway Capacity Study is being prepared by Mott MacDonald on behalf of Rossendale Borough Council, to identify the highway impacts of the Local Plan across Rossendale, including the impacts on the SRN. At the time of writing, only the Technical Note on phase one of the Highway Capacity Study was available, which provides commentary on the assessment inputs, model development and results from the junction modelling.

Whilst much of the general modelling methodology appears to be appropriate, some clarifications are required in relation to traffic growth, trip rates and trip generation and trip assignment in the models. In addition, we have raised a number of significant modelling concerns across all of the models presented. At this stage, the models and associated results are not considered suitable to provide evidence on the highway impact of the Rossendale Local Plan, and we are unable to fully understand the likely level of impact upon the safety and efficient operation of the SRN. We also consider that the assessment is incomplete, with TD22/06 Merge/Diverge Assessments missing for the A56/A56/A682. Where Local Plan impacts are predicted to require changes to the layouts of the slip roads, a suitable solution is required to be identified by the Local Planning Authority.

Regarding mitigation measures, the proposed measures will need to be reviewed once the capacity modelling is completed. Furthermore, the Rising Bridge junction has been highlighted to require mitigation, but none has been proposed. Appropriate mitigation measures to support delivery of the Local Plan should be identified, and appropriate phasing considered for the relevant Local Plan site(s) to ensure mitigation measures are delivered in line with development. It is not appropriate to simply be reliant on the availability of capacity on the SRN for future access and travel needs, particularly for local trips. Nor should it be assumed that Highways England can deliver improvements without inclusion in our investment plans to accommodate growth. The Local Plan transport assessment is key to assessing the quality and capacity of transport infrastructure and its ability to meet forecast demands leading to the identification of short, medium and long-term proposals across all modes. These outcomes can highlight the need to consider alternative allocations or mitigation measures to ensure the proposed land allocations are sustainable, viable and deliverable.

According to National Planning Practice Guidance (NPPG) an assessment of the transport implications should be undertaken at several stages in preparing the Local Plan. The last of these stages should highlight the scale of and priorities for investment requirements and support infrastructure spending plans. It should be an iterative process that becomes more refined through the process itself; informing what is included in the plan and shaping its development. As part of the Draft Local Plan (Regulation 18) public consultation, Highway England requested an impact assessment should be undertaken of the aggregate impact of all proposed allocated sites, alongside assessments of those individual allocations which are expected to result in the most significant traffic impact. Whilst it is noted that some work has been undertaken, a response to our comments on the phase one study and an assessment of proposed mitigation measures has been outstanding until only three days before the end of this consultation period, and so is too late to have been considered. We look forward to reviewing the refined transport assessment evidence to provide confidence that the plan is deliverable and that supporting infrastructure, including access arrangements and improvements to the local transport network and sustainable forms of transport, will be provided in the right place at the right time. We will comment on this aspect in a separate response after the end of the current consultation period.

Within 'The Plan' the importance of working with partners to address key transport issues is recognised and Highways England has been actively engaging with the Council on the emerging transport evidence base. Despite this, many of Highways England's concerns remain outstanding. It is acknowledged that following our response to the 'Draft Local Plan (Regulation 18)' consultation, a transport evidence base is now being prepared, which includes an assessment of access arrangements and highway capacity. However, the transport evidence base has not been developed to a level of detail to allow Highways England to fully understand the cumulative impact of the proposed site allocations upon the SRN, or to have confidence that proposed mitigation measures will support the sustainable delivery of 'The Plan'.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Number of comments in this section

1

General Comments

Comments on policy	General	General
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Reference 13 Mrs Lois Lees		Number of supporters:
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Commenting on -	General	
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Is the Local Plan legally compliant? Did not answer	Is the Local Plan sound? Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
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I feel that you have made the process of objection and commenting on the local plan inaccessible for a large number of residents. A lot of people do not have the access to computers or the skills required to find the information online. I feel the process has been unfair and is unlawful

Do you wish to participate to the Examination In Public? Did not answer	Reasons -	
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Reference 22 Ms Lucinda Dudarenko	-	Number of supporters:
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Commenting on -		
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Is the Local Plan legally compliant? Yes	Is the Local Plan sound? Yes	Does the Local Plan complies with the duty to co-operate? Yes
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All good

All good

Do you wish to participate to the Examination In Public? No	Reasons -	
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Reference 23 Mrs Doris Paul	-	Number of supporters:
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Commenting on -		
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Is the Local Plan legally compliant? Yes	Is the Local Plan sound? Yes	Does the Local Plan complies with the duty to co-operate? Yes
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All good

All good

Do you wish to participate to the Examination In Public? No	Reasons -	
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Reference	24 Mrs	Rosemary	Atherton	-	Number of supporters:
Commenting on	-				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	Did not answer
<p>Rossendale has been proved to be the most congested outside of a city. The local plan is unsustainable as far as ANY extra traffic is concerned. There are still many industrial units empty in the valley, so there is NO exceptional circumstances for removing any piece of land from green belt.</p>					
-					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons	-		

Reference	25 Mr	Bob	Crawford	Fero Consulting Ltd	Number of supporters:
Commenting on	Holistic level				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	No	Does the Local Plan complies with the duty to co-operate?	No
<p>I think the plan fails to tackle the core elephant in the room.The valley has air quality issues and in the main the M66 is the source of such pollution, as well as being traffic jammed at core commuting times of the day. It also floods and freezes in the winter due to rain/snow fall and surface water run off.The emergent plan does not tackle this issue.The emergent plan is vague in respect of the true level of development on the Green Belt-it is unclear the percentage and area levels of development which are genuinely on Green Belt land. I have estimate that this could be around 60-70% of the development will be on Green Belt. FYI-The UK average Green Belt usage for development as between 4-10% for 2016-17 depending on which ONS report you read.The emergent plan is therefore way over the UK average.We are only developing some 25% of the available Brownfield land bank as it stands and it is too easy to say it is expensive to use this element of resource-final and develop ways around the constraints. Check out Brockholes in Preston and you see what I mean.Therefore based on the two assertions above I consider the plan to be lacking in clarity and soundness of thinking based on which is in fact a human ecosystem development rather than just rural development plan.It lacks an overall holistic approach to such changes by delaying any development along the railway line-helping to tackle air borne pollution and in term damages the ecosystem to help sequestrate CO2e levels by removing Green Belt alongside the motorway system.Good soil management is one of the best ways of tackling water attenuation and CO2 levels.Therefore we need to Green Belt-once you remove it you do not get it back.Something that other Authorities are actually planning into the developments of motorway and road network systems (Ref: Lancaster, Nottingham)</p> <p>Start with development of the communication channels-this is what they do in France for instance. Compare their communication channels to ours and you will see what I mean.Develop the railway line and the public transport system much more than we are currently suggesting.De-carbonise and de-pollute the model through that process.As a minimum maintain the Green Belt especially alongside the M66 corridor but in general in all cases.Go back to the drawing board on the Brownfield land and re-assess the options with the help of developers who truly understand, create and deliver Sustainable Development to the benefit of all stakeholders including Nature and the Environment.Do not allow Developers to simply request re-allocation of Green Belt land for development use.As we will cause irreparable damage to the valley ecosystem-human and natural.The EA has estimated that a single hectare of soil has the potential to store and filter enough water for 1000 local people!!. With climate change causing more extreme weather patterns, we need the local areas of Green Belt.It is very easy to undervalue such land-water, carbon, vegetation, food, animal,s and may be most importantly the health and well-being of humans.</p>					
Do you wish to participate to the Examination In Public?	No	Reasons	-		

Reference **36 Mrs Audrey Nicholls** - Number of supporters:

Commenting on -

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

None

None

Do you wish to participate to the Examination In Public? **No** Reasons -

Reference **37 Mr Raymond Nicholls** - Number of supporters:

Commenting on -

Is the Local Plan legally compliant? **Yes** Is the Local Plan sound? **Yes** Does the Local Plan complies with the duty to co-operate? **Yes**

None

None

Do you wish to participate to the Examination In Public? **No** Reasons **None**

Reference **55 Mr Gary Cunliffe** - Number of supporters:

Commenting on -

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

i feel the plan is still nowhere near sound as its still using out dated and completely factually incorrect evidence when it comes to multiple issues, from school places to the ability of local services and infrastructure being able to support the extra numbers more housing will bring. what makes it obvious the council plan is using false evidence is the fact the current infrastructure cant manage with the amount of people living within rossendale now. you have identified areas in whitworth for housing which if built would add at the very least 200 car journeys past two schools at rush hour as well as empty them out on to a already congested (and ignored by you're traffic survey oddly enough) junction at hall st/market st whitworth. let alone the fact these 100 houses will probably require around 100+ school places at already over subscribed schools within whitworth.

i honestly feel the councils planning department is either lying to the public over this or is being pressured by management over producing this plan just to hit this target that was set by the government, what is even more baffling is why planning officials are claiming our local mp is ducking them when he hasnt had any requests for meetings since getting the number dropped from 5000 to 3000. other issues this plan outright ignores for whitworth is the total lack of new jobs any of these homes will require, so the new people will have to travel out of the valley on already congested roads with public transport that in rush hour is very iffy and come any sort of minor hold up on the 464 route totally non existent with little or no explanation as to whats happening. sticking with transport the cycle route if its eve finished would ease some problems but the lack of secure cycle storage across the valley limits many people using it for shopping or transportation for work if they dont have a place at work to secure them something thats been brought up and ignored again. now on to playing fields, a year ago you looked at building on john st pitch in whitworth but were made to back down due to local outcry, the sad thing is the sports facilities within whitworth and shawforth have gotten less over the past decade, we have lost a football pitch at oak st which after the last traveller invasion was surrounded buy mounds of earth and left and it seems if you had you're way we'd have lost another one at john st, if we are getting more houses we need more facilities for public use, its easy to say go to marl pits but thats not exactly a easy trek if you're on public transport also theres only so many people who can use their pitches at a time.

i can only talk about whitworth but i imagine this could also be applied to the i rest of the areas in the plan. first up figure out how many potential school places each development would need and see how many ACTUAL school places where free this year at start of term. then make a plan to expand the schools or open a new one, we lost one school in whitworth in the 1990;s lloyd street a primary schools. and another in the 1980;s another primary school at levengeave. figure out how much extra traffic and stress on public transportation there will be, and plan accordingly. i have looked at the traffic survey and it seems rather too upbeat and light in some coverage of areas. but again if you drop 300 houses in whitworth and say 150 people will need to use public transport at rush hour, thats 3-4 extra buses worth of people. when theres only 4 buses an hour thats an issue. jobs, i know you cant make jobs appear locally but even by you're own evidence you say you need lower the number of people travelling out of the area for work, well more housing and no extra jobs aint going to help that so maybe look at trying to encourage new start up's pr expansions of local firms with grants or discounts on local rents and taxation where possible. and if you dont have the tools to do this contact our local mp with a plan of what it would take and what you would need to do it and ask!!! apply for some of the £5 BILLION fund setup for help with this housing plan so see if you can get some of that. which from what iv heard rossendale hasnt applied for a penny?! but in general maybe take a step back and think what you will need when it comes to jobs, services and everything else to support the new houses. like iv said 300 houses in whitworth means 300+ cars and 900+ people which will all need the ability to move around locally on public transport and roads, as well as gp's dentists and school places as well as work. if you cant imagine what this means maybe all at the planning department need to just own up to being unable to actually plan for the future as this plan seems very half hearted and not forward looking one bit.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons -

Reference **74 Mr Alwyn Davies** - Number of supporters:

Commenting on

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Statement of Community Involvement - Proposing that the preparation of the plan is not sound and has not met the legal requirements of a public consultation.

On Page 9 section 2.3 the council sets out its commitment to consult with stakeholders in the development of planning processes which includes, residents, business, developers, agents and landowners. This is in line with the Consultation Principles published by the Cabinet Office in 2018 which states: "Consultations should be targeted. Consider the full range of people, business and voluntary sector affected by the policy and whether representative groups exist. Ensure they are aware of the consultation and can access it. Consider how to tailor the consultation to the needs and preferences of particular groups, such as older people, younger people, or people with disabilities who may not respond to traditional consultation methods. "In my opinion it can be evidenced that Rossendale Councils Consultation process has failed to adequately consult with residents affected by proposed developments set out in the local plan therefore I would ask the independent inspector to consider if the council has met its statutory legal requirement in its duty to consult and if the council should be forced to begin this process again. It is my opinion that the council have breached the following principles.

1. Consultations should be clear and concise: All the documents associated with the draft local plan contain information presented numerically, tables and maps. The majority of supporting documents (evidence base) are over 50 pages long and all contain industry jargon and acronyms which I believe may exclude people from providing their opinion on the consultation. I have seen no evidence that the council has made any attempts to provide this information in easy to read formats or provided a consideration for those like me who are not experts in Local Planning policies and procedures. I have also found no evidence of how the council has considered, for example, those who's first language is not English or those who have learning difficulties. It is clear that the council has not provided information in a form that is comprehensible to the general audience of consultees, the residents of Rossendale. I would like to bring your attention to Case Law R South West Care Homes V Devon CC and Royal Brompton and Harefield NHS Foundation Trust V Joint Committee of Primary Care Trusts and Anor which detailed that 'Prescription to Fairness' is an aspect of fairness in that a consultation document presents the issues in a way that facilitates an effective response, another aspect of fairness lies in the representation of the information of which the views of consultees should be sought.

2. Consultations should have a purpose: I fail to see how the council have consulted with residents during the 'formative stages' in developing the local plan (Regulation 18). My rationale for this is that the council received 3046 comment's on the local plan with 88% objecting to the plan and only 5% in support of the plan however there have been no significant changes made to the plan suggesting that the council already had a final view in relation to the vast majority of proposals. To provide an example the land north of Hud Hey received 11 objections, 2 neutral and 1 in support however the council have not make any alterations or removed this land from the draft local plan. The Formal Local Plan consultation report and updated statement of community involvement dated 11th July 2018 show that despite over 2000 pages of comments regarding the plan only 4 sites have been removed and any additional changes appear to be very minor in nature. On Page 4 of the document it states that two employment sites remain allocated despite being contrary to the findings of LUC citing that the proximity to the A56 is sufficient as exceptional circumstances however the Highways Agency report states that the roundabout cannot accommodate the proposals within the local plan. Therefore having consulted with the public, with the highways agency and with an independent provider's all having different agenda's, not one is in support of using land in Hud Hey the council have still included these in the current version of the report. How can this be called a consultation? The report of the planning department on the 11th July 2018 page 6 states the following: "The publication version (regulation 19) of the local plan is a key stage in the development of this document. It effectively represents the councils preferred plan and is the document which will go forward." This effectively proves in writing that the public of Rossendale were consulting on a done deal. I would urge the independent inspector to please review case Law Bersted Parish Council and Arun District Council November 2003 in which the Honourable Mr Justice Richards quashed the councils plans under similar circumstances due to failure (in my own summary) to adequately

consult and validate the soundness of the plan.

3. Consultations should be informative: It is clear that information is not sufficiently detailed as to enable consultees to understand the proposal and make meaningful representations from it. To comment on the consultation document firstly I have had to read Rossendale Draft Local plan which contains information that is complex, specialist and not explained. To contextualise the draft plan and prepare my response for the consultation I have also had to read guidance of a similar nature which included: • Rossendale Green Belt Review 2016 • The planning inspectorate report to Rossendale Council in 2010 • The Sustainability Appraisal of the Rossendale Local Plan May 2017 • Authority Monitoring Report June 2017 • Statement of Community Involvement

4. Consultations should be targeted: The council confirmed at a meeting held in Haslingden Library on the 19th September 2017 that the council had promoted the consultation by putting one article in the Rossendale Free Press (This is a local paper which must be purchased), a post on Facebook (which excludes a vast majority of the residents of Rossendale) and posted the information on the Councils Websites (which with the greatest of respect unless you need information on your bin collection one would have no reason to access it). It is clear that this falls significantly short of a targeted consultation process and it could be argued that the council has done the opposite and tried to engage with as few residents as possible. As a resident significantly affected by the proposal the council has made no effort to consult with me or to gain my views and has it not been for a concerned resident I would not have been able to express my views or exercise my right to respond to this consultation. The council lists the methods its uses to consult as: • Other electronic media e.g. Twitter. • Leaflets Brochures • Notices of Consultation on lamp-posts • Formal Written Consultation / Community surveys • One to one meetings with individual stakeholders, • Public Meetings, • Area For * Planning Aids

However fails to use any of these means, I would ask the Inspector to consider case law: Omagh District Council V The Minister with responsibility for health and social services and public safety in which a councils objection in regards to being adequately consulted with was upheld in 2004.

At the meeting at Haslingden Library last year we asked Nicola Hopkins the planning manager why effected resident of the local plan had not been written to directly and her response was that people generally throw information in the bin as they did with the consultation to the local plan (Core Strategy in 2011). I asked Nicola how the council has come to this conclusion for example; had an evaluation of the previous consultation evidenced that people threw the information in the bin? If so how many people? I wanted to understand how the council had evidenced that this was an ineffective means of consulting with people. Quite honestly is saddens me that employees of the council have such little respect for the residents of Rossendale of which they serve. I asked Nicola if I submitted a Freedom of Information request asking for this information would it be available. Nicola confirmed that this decision has been taken following chat within her team which was not a minuted meeting. Separately to commenting on the consultation process this worries me as to how the council generally conducts its business. I would also like for consideration to the timings of the first consultation meetings in October 2017 to be given which were held between the hours of 4-7pm in the evening. This significantly reduced the opportunity for those in employment to be able to attend the meeting(s).

For the second part of the consultation process – the council only held two meetings which were in the same week (13th and 18th September) at the same venue. I would be most grateful if the inspector could decide if this provides an appropriate level of opportunity for residents to attend. I myself was on holiday that week so was essentially excluded from having the opportunity to attend the meetings. I also wonder if people who rely on public transport would be able to attend as the meeting was held 3-7pm on the far side of the valley.

I would also like to bring to the inspectors attention that Lancashire County Council wrote to each resident in Helmshore to ask for their views on the East Lancashire Strategic Cycleway Network Consultation (Letter Ref ELSCN16) which was sent on the 16th May 2016. This suggests that Nicola Hopkins is wrong in her assumption that the people of Rossendale ‘throw away’ their opportunity to have their voice heard as my daughter is still in receipt of this correspondence. It also suggests that writing to those

affected by the plans is practice which is completed in neighbouring authorities.

5. Consultations should take into account the groups being consulted: (As per point 4)

6. Conducting a fair consultation: As a resident who would be affected by the current draft plan I had no knowledge of the proposal until a concerned neighbour canvassed the area and highlighted the council's consultation process to us in a letter that he had produced. For context the proposal in the local plan would mean that my house would be encapsulated by employment space (Warehouses and Factories) on what is currently Green Belt Land. Surely the council have a duty to notify me and others? At the meeting the Senior Planning Officer and Nicola Hopkins Planning Manager advised that the landowners of EMP2.15 has been written to and consulted with and it was very promising that the land would be sold to support the local plan. The landowner was contacted during the meeting who confirmed that they had not been contacted or written to and they had no knowledge of the consultation process. I highlighted to Nicola that it was my understanding that it was illegal to provide false and inaccurate information during a consultation process and the process can now be classed as flawed. Nicola acknowledged that this was a significant failing from her team. This was evidenced in the Land North of Hud Hey consultation response whereby the land owner confirms that they had only been written to regarding the use of their land following the initial consultation stages therefore information provided at the consultation event has been proven to be inaccurate. Additional Information: We discussed our concerns with Councillor Marilyn Proctor who was unable to comment or advise on consultation practice and process and when questioned about what an exceptional circumstance is to build on greenbelt land replied if there a 'Horse' on the land you should be fine – My only comment is respect of this is that it must be a concern to the council that members represent them in this manner. I would also like to add that there are horses in the field and the land is still included in the plan therefore would Councillor Proctor like to comment further? It is clear that the consultation process thus far has fallen short of commitment made by the council in the Statement of Community involvement 2014 and may not meet the legal requirements of a fair consultation at the very least it is fundamentally and significantly flawed. It would suggest that the council has breached its own policies and procedure has had not provided a fair, equitable and reasonable opportunity for resident of Rossendale to Contribute to the Draft Local Plan 2017. I would like to thank the inspector for taking the time to read my response and apologise for the lengthiness of the document however I felt that most of the points were too important not to include. I would welcome the opportunity to provide further information to the inspector at the examination in public stages of the local plan and would be most grateful if the inspector would kindly consider this.

Do you wish to participate to the Examination In Public? **Yes**

Reasons

Reference	86 Mrs Helen Holland	Blackburn with Darwen Borough Council	Number of supporters:
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Commenting on Whole Plan -

Is the Local Plan legally compliant? **Yes**

Is the Local Plan sound? **Yes**

Does the Local Plan complies with the duty to co-operate? **Yes**

On behalf of Blackburn with Darwen Borough Council, I wish to thank Rossendale Council for the opportunity to comment and to note that we have no specific comments to make about the policies or strategy of the Rossendale Draft Local Plan. We previously confirmed by way of an email, dated 13 July 2018, that there were no current duty to cooperate issues that were outstanding between the two councils. We concur with the statement at paragraph 5.8 of the Duty to Cooperate Statement (Incorporating Statement of Common Ground) whereby it is stated that "No authority came back to Rossendale specifically asking this Council to meet their development requirements, neither have they offered to meet any of Rossendale's needs."

Do you wish to participate to the Examination In Public? **No**

Reasons -

Reference **120 Mrs Michaela Cunningham**

Number of supporters:

Commenting on

General

Is the Local Plan legally compliant? **No**Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **No**

"I think yet again the council should provid this information by posting copies especially of paperwork through letter boxes the old fashioned way rather than relying on people to go online or take a trip to the library as it's probably not advertised that the plan is available and consultation is soon to close this is how deals are done without public knowledge or interference. If you reside in a area which may be over developed where you are going to lose your view or your green space then you should be informed as this direcall affects you its poor communication and disgusting. My family moved here for the rural aspect so why ruin it. I am opposing HS2 where I live on Lanehead Lane. There are graves on the site and this sits next to the conservation area. There are already issues with one way traffic, dangerous conditions in winter and flooding at the bottom of the hill. The road could not cope with more traffic, the drains with more houses. There is already insufficient parking on the road. The green space is used for dog walkers and also as a safe place for the helicopter to land. Keep our spaces green we don't want more pollution, more cars. There is already houses and buildings lying empty. Fill them first. Just greedy people making a profit. I am furious at the suggestion. "

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference **5018****Brian Michael****Kathy Fishwick****Rossendale Civic Trust**

Number of supporters:

Commenting on

General

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. Overview – Local Plan’s local history:

A. 4 years Delayed Progress to 2017’s Regulation 18 Consultation : Rossendale Civic Trust, after seeing Rossendale Borough Council deliver a Core Strategy well before others such as Bury and Blackburn, then saw progress slowed by reduced staffing and politically driven policy changes, and note these 2011 Planning Inspector’s expectations:- Report to Rossendale Borough Council by Roland Punshon BSc Hons, MRTPI an Inspector appointed by the Secretary of State for Communities and Local Government 10 October 2011...concludes that the Rossendale Borough Council Core Strategy Development Plan Document provides an appropriate basis for the planning of the borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.....

24. PPS12 requires that the CS should provide a policy basis for at least 15 years from the date of adoption. The Council expects adoption to take place in 2011 and, in line with the guidance, the plan period ends in 2026. I have taken into account concerns that, by the time the Council’s Site Allocations DPD is prepared and adopted, only about 13 years of the plan period would remain.....

25. The fact that the Site Allocations DPD may not be in place until 2013 should not prevent the Council from giving pragmatic consideration to development proposals before that time.....

B. RCT, after RBC’s 15 September reply to Freedom of Information Request – FOI/3684 on LOCAL PLAN POLICY 2 – DENSITIES DELIVERED 2011-2015, came to conclusion. Rossendale could soon be “built out” with low density developments surely not in accordance with the Local Plan’s Core Strategy, nor a way to deal with our national need to build for an increasing and not that rich population; and a need to take note of Census occupancy figures.

C. RCT then saw 24th February 2016 the formal Notice of Withdrawal of draft Local Plan Part 2 “Lives and Landscapes” and:-

3 Mar 2016 - We have started a campaign “Keep Rossendale Valley Green” and our Council Leader Alyson Barnes has written a letter to David Cameron ...

The Tory Government want to build over 5,000 new houses in Rossendale.

We know that there is a national housing shorting and we want to play our part but the number of new houses is just too much for Rossendale to cope with. Rossendale is set in steep valleys which leave little room for building. Large areas of green belt land will need to be built on to accommodate 5,000 houses.

We have started a campaign “Keep Rossendale Valley Green” and our Council Leader Alyson Barnes has written a letter to David Cameron asking him to reverse his government’s decision to force the Council to build houses that will damage our Valley forever.

We want as many people as possible to join the campaign and so we are asking you to add your name to Alyson’s letter asking David Cameron to reconsider. You can sign the letter and read more about the campaign at:

<http://www.keeprussendalevalleygreen.co.uk/>

D. RCT now see, from Jake Berry MP Rossendale and Darwen 14 September 2017:-

One of my priorities at the last election was to defend our local countryside from over development so I’m really pleased to confirm that our local housing figures, which have caused such controversy are set to be dramatically slashed.

There was outrage last year when plans were published to build up to five thousand new houses across the Rossendale Valley, when the Council controversially selected playing fields, countryside and football pitches for development.

Under the Government's new plans announced today, currently being consulted upon, Rossendale will see it's housing figures cut by over half from the plans previously proposed by Labour. The numbers for Blackburn with Darwen Borough council have also been reduced.

I’m delighted that after raising this issue at the highest levels that I’ve been able to get the housing figures reduced to protect more of our local green spaces. Rather than playing political games, I’ve got on with the job, working on a cross-party basis and I’m so pleased that we have succeeded. This is a victory for everyone here in Rossendale &

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Darwen.

Given the reduction we have managed to secure - I'm calling on the Councils to now suspend any proposal to remove land from our green belt and prioritise new developments on brownfield and former industrial sites.

The Government's new figures apply from April 2018 and are subject to consultation but they confirm that the number of new homes required for Rossendale over the next 10 years has been reduced to just 2,120 and the numbers for Blackburn with Darwen have been cut to just 1,530.

RCT note how practicalities must not stand in way of politics.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference	5119 Mr Richard Lester		Number of supporters:
Commenting on		General	
Is the Local Plan legally compliant?	No	Is the Local Plan sound?	No
		Does the Local Plan complies with the duty to co-operate?	Did not answer

PRELIMINARY

I submit below my representations about the Rossendale Draft Local Plan Pre-Submission Publication Version (Regulation 19 Consultation).

I would add that I rely on the research into housing and employment site availability conducted by Alan Ashworth and submitted as part of his representations.

I request to be notified, at my address shown at the end of this document, of each of the following—

- (i) the submission of the Local Plan for independent examination under section 20 of the Planning and Compulsory Purchase Act 2004,
- (ii) the publication of the recommendations of the person appointed to carry out an independent examination of the Local Plan under section 20 of the Act, and
- (iii) the adoption of the Local Plan.

I request also the opportunity to appear before and be heard by the person appointed to carry out an independent examination of the Local Plan.

INTRODUCTION

A. Objection is made to the draft Local Plan (LP) on the grounds that it is not legally compliant, because:

1. it is not in conformity with any Local Development Scheme (LDS);
 2. the decision of the full Council to consult on the draft was so unreasonable as to be unlawful in that the councillors knew the document proposed the removal of land in Edenfield and elsewhere from Green Belt but that notwithstanding the requirements of the National Planning Policy Framework they had no evidence, and had not identified exceptional circumstances, to justify the proposal;
 3. if amendments to the draft were made after 11 July 2018 and before publication, they will have been made by an officer or officers acting ultra vires and the consultation is thereby flawed;
 4. not until after the start of the consultation period were some of the proposed submission documents published by being added to the Council website;
 5. the Statement of the Representations Procedure is incorrect;
 6. the Statement of Consultation is incorrect; and
 7. the Sustainability Appraisal is misleading.
- B. Further objection is made on the ground that the LP is unsound, because:
1. it is not evidence-based and is contrary to national planning policy
 2. some of the purported evidence has been produced after production of the LP;
 3. where the Council has declined to take into account potential development sites for the stated reason that the landowner has other plans or is unwilling to develop, they have failed to consider, or failed to demonstrate that they have considered or would consider, using their compulsory purchase powers to ensure the proper planning of the area.
 4. the reasons belatedly produced by the Council to explain the removal of land in Edenfield and New Hall Hey from the Green Belt do not constitute exceptional circumstances at all;
 5. there is conflict between Policies HS2 and HS7; and
 6. Policies HS3: Edenfield and EMP7: New Hall Hey are inherently unsound.

A2. Decision of Council to consult on draft Plan so unreasonable as to be unlawful

A2.1 At its meeting on 11 July 2018 the Council resolved:

1. To undertake formal consultation in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012 with all stakeholders on the Pre-

Submission Publication version of the Local Plan for Rossendale (Written Statement and Policies Map) and the associated documents for six weeks starting w/b 20th August 2018.

2. Authority is delegated to the Planning Manager/Director of Economic Development to make any changes as required to rectify errors and improve the Draft Local Plan (Written Statement and Policies Map) prior to publication in August 2018.

3. That the Planning Manager/Director of Economic Development in consultation with the Portfolio Holder for Regulatory Services be given delegated authority following the six week consultation period to submit the Submission Draft of the Rossendale Local Plan to the Planning Inspectorate for examination.

4. That Council approve consultation on an updated Statement of Community Involvement (SCI) to act as the basis for undertaking consultation on planning applications; Local Plan consultation and liaison with Neighbourhood Forums/consultation on Neighbourhood Plans.

5. That this Council ask the Planning Inspector to give full and due consideration to the local community plan in relation to Edenfield.

6. To amend the plan and 5.5 of the report to remove Barlow Bottoms and state "Gypsy and Traveller Transit site relocated to a small discreet piece of land owned by the Borough Council at the far corner of Futures Park"

A2.2 The version of the Local Plan before the Council on that date contained Strategic Policy SD2:

Strategic Policy SD2: Urban Boundary and Green Belt

All new development in the Borough will take place within the Urban Boundaries, defined on the Policies map, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.

Land has been removed from Green Belt in the following locations on the basis that exceptional circumstances exist:

- H70 Irwell Vale Mill
- H71 Land east of Market Street
- H72 Land west of Market Street, Edenfield
- H73 Edenwood Mill, Edenfield
- NE1 Extension to Mayfield Chicks, Ewood Bridge
- NE2 Land north of Hud Hey, Haslingden
- NE4 Extension of New Hall Hey, Rawtenstall

The Council will expect that the design of development on the above sites minimises the impact on "openness" to the satisfaction of the Local Planning Authority. Development will also be expected to contribute to compensatory improvements to land elsewhere in the Green Belt, enhancing both its quality and public access.

Explanation

The settlement boundaries set out on the Policies Map define the extent of the towns and villages within the Borough. Sustainable Development will normally be permissible in these locations subject to the policies of the Plan as a whole.

Development in the countryside will be supported where it is for a use that needs to be located in this location. Examples would include farm diversification or certain types of tourism uses.

The Plan makes a number of changes to the Green Belt boundaries which have been incorporated in the urban boundary. Most of these are cartographical changes. A small number of major changes have been made to the Green Belt boundary, most notably at Edenfield for housing and at Rawtenstall and Haslingden for employment use. Exceptional circumstances are considered to exist that justify the proposed releases. At Edenfield this particularly relates to the strong defensible boundary of the A56 and the opportunity to masterplan the site to produce a high quality planned development that minimises impact on openness. For the Green Belt employment sites the challenge of finding suitable employment land with strong market demand close to the A56 corridor, is considered to be an exceptional circumstance.

Masterplanning or for smaller sites, the development of a design framework, will be expected to demonstrate how the design of the scheme minimises impacts on openness such as through the location of development within the site; the scale of the buildings and appropriate landscaping. In order to provide compensatory improvements to the

remainder of the Green Belt, developments will be expected to contribute to enhancements to other open space and improved recreational access.

This could include the identification of land appropriate for Suitable Alternative Natural Greenspace (SANG's).

A2.3 Strategic Policy SD2, then, refers to removing land in Edenfield from the Green Belt on the basis that exceptional circumstances exist. This is a nod to paragraph 136 of the National Planning Policy Framework, which provides that, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The Explanation to SD2 adds:

Exceptional circumstances are considered to exist that justify the proposed releases. At Edenfield this particularly relates to the strong defensible boundary of the A56 and the opportunity to masterplan the site to produce a high quality planned development that minimises impact on openness.

A2.4 That is all that the LP says about exceptional circumstances, and it does not stand up to scrutiny. Yes, the A56 divides the Green Belt in Edenfield into easterly and westerly portions, but the possibility of its being an alternative boundary is no justification for removing the easterly portion from the Green Belt. It is not exceptional for a road to run through Green Belt. Nor is the opportunity to masterplan the site: any large undeveloped or cleared site can be masterplanned.

A2.5 The reality is that the Council did not have any evidence or any justification by way of exceptional circumstances for removing the land in Edenfield from the Green Belt. They took into account factors (the A56 and masterplanning) that should not have been taken into account. The decision to undertake Regulation 19 consultation on a draft containing this proposal was not just unsound. It was not just unreasonable. It was so unreasonable that no reasonable person acting reasonably, directing their mind to the facts and disregarding irrelevant considerations could have reached it. For these reasons the decision to consult on the part of the plan dealing with the Green Belt land at Edenfield must be treated as unlawful and that part of the plan, if not the whole, must be rejected, in accordance with the principles in the case of *Associated Provincial Picture Houses Ltd v Wednesbury Corporation* [1948] 1 KB 223.

A2.6 Even if some exceptional circumstances were to be identified after 11 July 2018, such a discovery would not cure the defective decision-making process.

A3. Unlawfulness of post - 11 July 2018 amendments to Consultation Draft Plan

A3.1 Part of the Council's resolution on 11 July 2018 was:

Authority is delegated to the Planning Manager/Director of Economic Development to make any changes as required to rectify errors and improve the Draft Local Plan (Written Statement and Policies Map) prior to publication in August 2018.

A3.2 This delegation to two officers is so unclear and ambiguous that any decision in reliance on it must be ultra vires. To whom exactly is the power delegated? Is the slash disjunctive or conjunctive? In either case, what would happen if the officers disagreed? Or does it mean one takes the decision after involving the other, and, if so, which one?

A3.3 In any event the statutory power to delegate to an officer - section 101(1)(a), Local Government Act 1972 - means just that: one officer, not a plurality of them. It is not a case where the Interpretation Act 1978, section 6, can be prayed in aid to say that the singular includes the plural.

A3.4 Any decision pursuant to this delegation must be ultra vires. Therefore, without prejudice to the questions whether they were required and, if so, by whom, any substantive amendments to the Regulation 19 consultation draft of the LP made by an officer or officers after 11 July 2018 have not been lawfully authorised by the Council and cannot be allowed to stand.

A3.5 If the consultation has been taking place on a partially unauthorised document, the consultation is so flawed as to be invalidated.

A4 Late publication of proposed submission documents

A4.1 In considering this aspect, it may help to set out the relevant legislation. Regulation 17 of the Town and Country Planning (England) Regulations 2012 S.I.2012 No 767 ('the 2012 Regulations') includes the following definitions:

"proposed submission documents" means the following documents—

- (a) the local plan which the local planning authority propose to submit to the Secretary of State,
- (b) if the adoption of the local plan would result in changes to the adopted policies map, a submission policies map,
- (c) the sustainability appraisal report of the local plan,
- (d) a statement setting out—

- (i) which bodies and persons were invited to make representations under regulation 18,
- (ii) how those bodies and persons were invited to make such representations,
- (iii) a summary of the main issues raised by those representations, and
- (iv) how those main issues have been addressed in the local plan, and
- (e) such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan; and

“statement of the representations procedure” means a statement specifying—

- (a) the title of the local plan which the local planning authority propose to submit to the Secretary of State;
- (b) the subject matter of, and the area covered by, the local plan;
- (c) the date by which representations about the local plan must be received by the local planning authority, which must be not less than 6 weeks from the day on which the statement is published;
- (d) the address to which representations about the local plan must be made;
- (e) that representations may be made in writing or by way of electronic communications; and
- (f) that representations may be accompanied by a request to be notified at a specified address of any of the following—
 - (i) the submission of the local plan for independent examination under section 20 of the Act,
 - (ii) the publication of the recommendations of the person appointed to carry out an independent examination of the local plan under section 20 of the Act, and
 - (iii) the adoption of the local plan.

Regulation 19, *ibid.*, provides:

Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

Regulation 20, *ibid.*, provides:

- (1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.
- (2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.
- (3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.

Regulation 35, *ibid.*, provides:

- (1) A document is to be taken to be made available by a local planning authority when—
 - (a) made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and
 - (b) published on the local planning authority’s website,

A4.2 The combined effect of these Regulations must be that the Local Plan and all the proposed submission documents shall be available for inspection throughout the consultation period. Regulation 20(2) precludes any purported extension of the consultation period.

A4.3 The Council’s website page headed Consultation on the Publication Pre-Submission version of the Local Plan as at 5 October 2018, the final day of the consultation period, stated:

Please see below the relevant documentation, a further Topic Paper on Employment will be made available soon.

Statement of Representations Procedure (PDF - 196.21 KB)

Publication (Pre-Submission) version of the Local Plan (PDF - 2.99 MB)

Errata to the Publication (Pre-Submission) version of the Local Plan (3rd September 2018) (PDF - 316.86 KB)

Policies Map (PNG - 17.44 MB)

Policies Map Errata (PDF - 774.42 KB)

Sustainability Appraisal of the Publication version of the Local Plan (PDF - 5.73 MB)

Habitat Regulations Assessment (PDF - 3.15 MB)

Duty to Co-operate incorporating Statement of Common Ground (PDF - 531.71 KB)

Statement of Consultation (PDF - 416.91 KB)

Green Belt Topic Paper (PDF - 7.34 MB)

Gypsy and Traveller Topic Paper (PDF - 7.75 MB)

Strategy Topic Paper (PDF - 5.61 MB)

Housing Topic Paper (PDF - 457.85 KB)

A4.4 It is immediately obvious that a relevant Topic Paper, on Employment, is not available. By 'relevant', the Council presumably mean a supporting document which in the opinion of the local planning authority is relevant to the preparation of the LP. It is also immediately obvious that less than five weeks have been allowed for consideration of their highly detailed "Errata" document.

A4.5 It appears that some of the other documents on the page mentioned in paragraph A4.3 above and possibly some documents on another page Home>Planning and Building Control>Local Plan>Evidence base might have been placed there after the consultation period began. A request for information about the dates of their first display on the website is being submitted to the Council, and the right to comment in the light of any reply is reserved.

A4.6 On 2 October 2018, just three days before the end of the consultation period, the Council advised by email to persons on their address list:

Please note that the Rossendale Local Plan Highways Capacity Study has now been published on the Council's website. The final consultants' report is available to view here: https://www.rossendale.gov.uk/downloads/download/11031/highways_capacity_study. The Council will discuss the outcomes of the study with the relevant highways authorities.

A4.7 The overall picture that emerges is that the LP has been rushed to publication without having been properly checked for accuracy and without the availability of all the proposed submission documents. It is outrageous and a case of maladministration to begin consultation in these circumstances. It is, to put it plainly, a derogation from the rights of the public to have fully six weeks to comment on the LP and supporting documents. It is a blatant procedural defect. The consultation is unlawful and must be re-run.

B2 Some of the purported evidence has been produced after production of the LP

B2.1 To the extent that proposed supporting submission documents have been added to the website after publication of the LP, they cannot be regarded as evidence on the basis of which the LP was prepared. This applies to the Policies listed in paragraph B1.1 above.

Do you wish to participate to the Examination In Public? Yes

Reasons

Reference **5120 Mr Peter Wilmers**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

I would like to submit the following comments on the consultation draft of the Rossendale Local Plan. I would be very grateful if you would please confirm receipt of these.

First of all two introductory comments.

1.1) I am a fully qualified Town Planner , and a retired member of the Royal Town Planning Institute. I worked as a senior planner in Norfolk before coming to Rossendale about 30 years ago to set up the Rossendale Groundwork Trust, to contribute to the environmental and social regeneration of Rossendale. For 20 years, under my direction ,this delivered around £1m worth of regeneration outputs per annum, including around 20,000 trees planted per annum, the creation of the Rossendale and Irwell Valley Ways, award winning guided walks programs, environmental education programs in most Valley schools and also training programs for 100-150 local unemployed each year. After Groundwork I ran a 3 year program for the NWDA to promote the economic benefits of Green Infrastructure.

1.2) I have had some problems reading the draft local plan in detail. This is partly because I have been abroad and partly because I am undergoing treatment for reoccurring melanoma at Christie's and at the Royal Marsden. I have had to access the documents through my iPhone, which is hard. And I am having to write these again on my iPhone whilst undergoing treatment at Christie's. But nevertheless I hope the comments which follow will prove useful. I would be happy to add to these.

MY COMMENTS

2.1) Because of the Council's abysmal record on Planning and design under different administrations it is vital that the plan contains well written, tight and monitorable policies on design standards , landscape, green infrastructure, ecology etc AND that these ARE monitored. The environment of The Valley (Rossendale) has become noticeably degraded over the last 20 years. I will give two examples. The new ASDA building in the centre of Rawtenstall is insensitive and ugly, and the way the river has been boxed in beside it reveals an ignorance of basic environmental principles. The second example, more recent, is the appallingly low standards of design in both the new retail and employment areas alongside the dual carriageway entry to Rossendale, ruining what should have been a well landscaped entry to Rawtenstall. The planners failed to link these developments to existing footpath networks (esp across the dual carriageway), allowed suburban and insufficient tree planting/ landscape barrier, and failed to reflect the importance of carefully designed rooves in a development at The Valley bottom. The design of the new Macdonalds building (though sadly not the landscaping), opposite shows they can do better on the rare occasions when they try. So fine words in the Plan will not be enough. There need to be tight policies on design ,colours/materials (including rooves), on proper and appropriate landscaping, on ensuring proper links to footpaths and cycleways..... Green rooves on key sites would be most welcome.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5148****Edenfield Community Neighbourhood Forum**

Number of supporters:

1213

Commenting on

Is the Local Plan legally compliant? **No**Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Troy Planning + Design (Troy Hayes Planning Limited) has been instructed by Edenfield Community Neighbourhood Forum (ECNF) to prepare representations to the Rossendale Local Plan (Regulation 19) Consultation. I confirm that we wish to appear at the upcoming Local Plan examination hearings on behalf of ECNF.

As you will be aware, Edenfield is a designated neighbourhood area (see Appendix 1 for the designated neighbourhood area boundary) and the ECNF is the qualifying body preparing the Neighbourhood Plan. We are providing the Forum with consultancy support on the Neighbourhood Plan which is currently making good progress through its initial stages.

In summary, we consider that the Local Plan, Sustainability Appraisal and supporting evidence base to be unsound and not legally compliant. We explain our reasons for this in the attached documentation.

We request to be notified of the following via email address: X or by post at X:

- When the Rossendale Local Plan has been submitted to the Secretary of State for independent examination
- Publication of the recommendations of the person appointed to carry out the independent examination of the Rossendale Local Plan
- Adoption of the Rossendale Local Plan

Please find attached our representations to the Local Plan consultation. We have grouped our detailed representations into the following sections:

- Overall Comments
- Statement of Representations
- Local Plan Policies
- Sustainability Appraisal

The Appendices to our representations are:

- Appendix 1: Edenfield Neighbourhood Area Boundary
- Appendix 2: Letter from MHCLG Secretary of State (11 September 2018)
- Appendix 3: Calverton PC v Nottingham CC Judgement
- Appendix 4: Viewpoint Map (with photos) of Edenfield

We enclose a separate attachment listing of individuals who support these representations. As you will note from the enclosed list it is comprised of the Edenfield Village Residents

Association and 1,213 individuals. The individuals comprise 898 residents of Edenfield, 156 other residents of Rossendale Borough and 159 people residing outside of the Borough. Please be aware that it is a condition of these individuals' support that their details are only shared with Rossendale Borough Council and the Planning Inspectorate. Also enclosed the results of an analysis of sites and land supply throughout the Borough which has been undertaken by the ECNF. The information contained in that document is a result of data analysis with RBC Officers in order to attempt to understand the reasons for discounting / not including sites in the plan. It is a working document and we will continue to update and clarify with RBC and the Planning Inspector as necessary.

Please include this Cover Letter as part of our formal representations.

Overall Comments

1. We have a number of important points to make on matters which do not necessarily fall under the specific policies of the Local Plan and consider that it would be helpful to set these out under this 'overall comments' section so that the RBC and the Inspector are aware of these from the outset of reading our representations:

13 December 2018

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- It is unknown whether RBC will submit its Local Plan to the Secretary of State before or after the 24th January 2019 date set by MHCLG in terms of the version of the NPPF used for examination purpose, we have therefore referred to both the 2012 NPPF and 2018 NPPF in a number of places in this document. We wish to provide further representations on this matter as part of the examination once the outcome of the submission date is known.
- The Local Plan appears to have two titles. On the cover of the document it is referred to as the 'ROSSENDALE DRAFT LOCAL PLAN Pre-Submission Publication Version Regulation 19 Consultation' whereas the footer throughout the document refers to it as 'Local Plan Written Statement (Regulation 19). This makes it confusing to the reader as to what the Local Plan should be called and should be addressed in the Council's modifications.
- The Local Plan contains no paragraph numbers. Apart from being unusual, not including paragraph numbers makes the Local Plan much more difficult to comment on when referring to specific paragraphs. This is also the case with the Topic Papers which have no paragraph numbers. The Infrastructure Delivery Plan does not include page numbers or paragraphs. Therefore, our representations refer to page numbers and explain where on the page we are referring to without the help of paragraph numbers.
- The Local Plan includes various text colours with some policy wording set out in the colour blue and others in the colour red. The Local Plan, as far as we can see, does not explain this colour coding so we are unclear of its significance.
- The Site Allocations & Development Management Development Plan Document Economic Viability Study (February 2016) and Update in Relation to Affordable Housing (2017) are out of date and not fit for purpose. The original study was undertaken in 2015 and published in 2016 and was prepared according to the study to "assess the viability of development across the Borough to ensure that the current policies contained within the adopted Core Strategy Development Plan Document are deliverable. The results of the testing will assist the Council in formulating the Site Allocations and Development Management DPD ("Local Plan Part 2")"1. The purpose of the update to this study in 2017 is solely focused on affordable housing. Therefore the Council does not have a whole plan viability study which assesses the Local Plan's policies and its proposed allocations therefore the plan cannot be considered to be viable.
- There are a number of outstanding key evidence base and topic paper that have not been made available for this consultation at all or were released after the consultation commenced and not subject to the full 6-week consultation as required by the Regulations. These are set out below with a summary:
 - o Local Plan Errata: The Local Plan Errata document is dated 3rd September which is eleven days after the consultation on the Local Plan commenced (23rd August). The proposed changes in the Errata are not insignificant as they deal with errors to housing sites, employment sites and the housing trajectory. RBC should have extended their consultation period by at least 11 days to compensate for these late changes.
 - o Employment Topic Paper: The webpage for the Local Plan Consultation states that "Please see below the relevant documentation, a further Topic Paper on Employment will be made available soon." It would appear that RBC still has outstanding work to do on its employment strategy and evidence given that this topic paper has not been prepared in time of consultation.
 - o Highways Capacity Study: The Emerging Local Plan webpage explains that "The Council commissioned a Highways Capacity Study to undertake a Highways Capacity Analysis in relation to the draft Local Plan. The Technical Note on phase one of the study is available to download here. Further analysis is currently being undertaken to identify solutions and the final report will be available to view here in due course." However, this study is not available as part of the Local Plan consultation. RBC has clearly proceeded with a Local Plan and spatial strategy without understanding the results of a key evidence base study on highways capacity in the Borough. Furthermore, the representors to the Local Plan, such as ourselves, have not been given the opportunity to review and comment on this evidence base as part of any consultation by RBC. Surely RBC should have awaited the results of the evidence base before it decided to proceed with their preferred strategy and consider their Local Plan to be sound. The Council instead decided to agree a Pre-Submission Plan despite it missing key evidence base including the Highways Capacity Study.
- The Heritage Impact Assessment (2018) of the proposed site allocations does not specify the heritage assets which are being assessed. For instance, it does not mention the Grade II* Listed Building (Edenfield Parish Church). Nor does the study indicate whether the 'setting' of heritage assets are assessed. We note that the Stubbins Conservation Area and its setting are not mentioned or considered by the assessment in relation to the strategic site proposed in Edenfield. These are very considerable shortcomings of the study which mean it is not compliant with the NPPF and not fit for purpose.
- The Sustainability Appraisal has incorrectly referenced many housing allocations within the Local Plan including the largest proposed housing allocation (H72) as H74. As such,

it undermines the credibility of this document and whether the assessments for each site have been accurately undertaken.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5150 Mr Alan Ashworth** Number of supporters:

Commenting on **General**

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Please find appended my Objection to the Rossendale Local Plan (Regulation 19) Consultation.

In summary I consider the Council's conclusion that "it is necessary to release Green Belt Land to meet the Housing Need" is inaccurate and I confirm that there are many alternatives available to the Council to meet the Housing needs without the use of Green Belt Land.

Furthermore I believe the Council have failed to follow the National Planning Policies or provide any justifiable Exceptional Circumstances to warrant the release of Land from the Green Belt for Housing needs.

I have prepared my objections into the following sections:-

- 1) The lack of any Exceptional Circumstances to justify the use of Green Belt Land.
- 2) The failure to follow National Planning Policy by not taking into account all reasonable alternatives.

I hereby confirm that I wish to appear at the upcoming Local Plan Examination Hearing as a Resident of the Village of Edenfield and the Secretary of Edenfield Community Neighbourhood Forum.

- When the Rossendale Local Plan has been submitted to the Secretary of State for independent examination
- Publication of the recommendations of the person appointed to carry out the independent examination of the Rossendale Local Plan
- Adoption of the Rossendale Local Plan

Finally, I request that you include this cover letter as part of my formal objection.

Yours sincerely

Alan G. Ashworth.

Do you wish to participate to the Examination In Public? **Yes**

Reasons I hereby confirm that I wish to appear at the upcoming Local Plan Examination Hearing as a Resident of the Village of Edenfield and the Secretary of Edenfield Community Neighbourhood Forum.

Reference	5155 Mr	Tim	White	Equality and Human Rights Commission	Number of supporters:
Commenting on	General				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
Subject: Local Plan for Rossendale (Regulation 19) Consultation					
Thank you for your email dated 23 August 2018.					
The Commission does not have the resources to respond to all consultations, but will respond to consultations where it considers they raise issues of strategic importance. Local, parish and town councils and other public authorities, as well as organisations exercising public functions, have obligations under the Public Sector Equality Duty (PSED) in the Equality Act2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. The PSED is an on-going legal requirement and must be complied with as part of the planning process. The Commission is the regulator for the PSED and the Planning Inspectorate is also subject to it. In essence, you must consider the potential for planning proposals to have an impact on equality for different groups of people. To assist, you will find our technical guidance here.					
Do you wish to participate to the Examination In Public?	Did not answer	Reasons			

Reference	5157 Ms	Joanne	Harding	Home Builders Federation	Number of supporters:
Commenting on	General				
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer
Future Engagement					
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.					
The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.					
The HBF would like to participate at any 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.					
Do you wish to participate to the Examination In Public?	Yes	Reasons			

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Executive Summary, Introduction, The Plan period,
Correcting SoundnessIs the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Executive Summary

This report forms one of a series of papers which collectively provide comments on the Rossendale Draft Local Plan Pre-submission Publication Version (August 2018) (PSLP) on behalf of Peel Holdings (Land & Property) Limited (hereafter “Peel”). The full suite of documents is as follows:

Paper 1 – Overarching representation (this paper)

Paper 2 - Assessment of Housing Needs

Paper 3 - Critique of Housing Land Supply

Paper 4 - Identification of Safeguarded Land Requirements

Collectively the above papers set out a number of critical concerns about the PSLP and its evidence base. As a result, Peel does not consider the PSLP to be capable of being found to be sound in its current form. A number of changes to the consultation plan are needed to correct soundness. These are considered in turn below.

Plan period

The NPPF makes clear that the strategic policies of a Local Plan should:

“...look ahead over a minimum 15 year period from adoption...” (paragraph 22)

This requirement has been substantially strengthened compared to the original NPPF (2012) which set out merely a ‘preference’ for Local Plans to be based on a fifteen year timeframe (paragraph 157).

The PSLP relates to a 15-year plan period, from 2019 to 2034. However, RBC’s current timetable for the Local Plan anticipates adoption in March 2020. If this is achieved it would mean that from the point of adoption there would only be 14 years of the plan period remaining. The DLP is therefore inconsistent with the requirement of the NPPF in this respect, such that it is unsound in accordance with the tests at paragraph 35.

To correct this point of soundness, the plan period should be extended to at least 2036 such that the plan covers a full 15 year period.

Spatial Strategy and distribution of residential development sites

Strategic Policy SS1

Whilst seeking to promote a hierarchical approach to the distribution of development according to settlement size and role, the spatial strategy does not reflect the importance and dominance of Rawtenstall and Borough wide function as the main service centre within Rossendale and the most sustainable location to accommodate development. This is reflected in Rawtenstall being defined as a Key Service Centre and in the same tier as significantly smaller settlements of Bacup, Whitworth and Haslingden. The Council has failed to present evidence to justify this approach.

Strategic Policy SS is unsound in its current form. It is not consistent with the NPPF in not representing the most sustainable approach to growth when compared to reasonable alternatives. It is not justified insofar as it runs contrary to the prevailing evidence around the role and function of settlements within the Borough.

To address this point of unsoundness, Rawtenstall should be defined as a ‘strategic service centre’ in a tier of its own and the first priority location for development.

The spatial distribution of housing allocations (Policy HS2)

As a result of the deficiencies in Strategic Policy SS, the distribution of housing allocations is unbalanced and does not reflect the logical settlement hierarchy. The Council has failed to adequately justify this approach. Most notably there is an under provision of residential allocations in Rawtenstall, relative to its existing size and role within the Borough and an overprovision of allocations in Bacup.

Whilst the physical constraints to development in parts of Rossendale are recognised, and would justify some over or under provision in individual settlements relative to their

position in the hierarchy in order that the numerical housing requirements of the plan can be met, the extent to deviation from the logical hierarchy is substantial and is not justified at this stage. This is particularly the case when there are evidently suitable and sustainable development sites located in Rawtenstall, including Peel's land holdings at Haslam Farm, which could be released for development through the Local Plan.

In this context, the distribution of residential allocations as presented through Policy HS2 cannot be justified and is unsound as a result. It does not represent an appropriate strategy and a sustainable means of meeting the Borough's development requirements compared to reasonable alternatives which exist. It therefore presents a clear conflict with NPPF.

The distribution of allocations also means that the PSLP will fail to meet, or come close to meeting, the affordable housing needs of the Borough. The allocation of sites in weaker market areas means there is no prospect of delivering affordable housing on the majority of proposed allocations based on the Council's own evidence base. This aspect of the plan is at odds with paragraph 61 of the NPPF and so is not consistent with national policy. It is unsound as a result.

To address this point of soundness, additional sites in strong market areas around West Rossendale should be allocated for residential development. This should include seeking to distribute development according to spatial strategy set out in the Rossendale Core Strategy as an approach proven to represent a sound and sustainable strategy. This strategy would be reflective of the sustainability of Rawtenstall as a development location and its status as the dominant service centre within the Borough as well as the viability of development in West Rossendale generally.

Meeting housing needs

In advancing a 'minimum need' for housing as its housing requirement the Council has failed to positively plan for the needs of its residents or local economy. The Council's own recently prepared evidence confirms that the full need for housing is significantly higher than the starting point minimum need figure calculated through the standard method. This recognises that in order to support economic growth and create the conditions for businesses to invest, expand and adapt the authority will need to see a greater growth in its working age population than projected under the official household projections which form the basis for the standard method calculation.

The Council has sought to constrain the economic growth it plans to provide for in both the level of need for housing and employment land. This approach is not supported by the evidence it has published, and is not considered to represent an appropriate strategy for Rossendale. Crucially it will not deliver sufficient affordable housing to meet its needs or address worsening affordability. It is also evident that the Borough has delivered, in a number of recent years, annual completions of new homes which have exceeded the 'minimum need', notwithstanding that low average rates of delivery have been achieved over a 10+ year period. The Rossendale market is evidently strong enough to support higher levels growth when the right sites are brought forward in the right locations to attract major housebuilders.

In accordance with PPG, this is a clear indicator of a greater level of housing need than is proposed to be planned for under the housing policies of the PSLP. The proposed housing requirement is therefore unsound as it is not positively prepared or justified based on the tests established through NPPF.

The proposal to plan for the provision of just 212 homes per annum is evidently not a sustainable approach to the growth of the Borough taking account of reasonable alternatives available to the Council. The proposal is not supported by the prevailing evidence base and will exacerbate the continued under provision and under delivery of affordable housing across the Borough. It is fundamentally unsound as a result. This aspect of the PSLP is not effective, is not justified and presents a series of conflicts with NPPF, including paragraphs 59 and 60.

To address this, Peel considers that the Council should progress the Local Plan on the basis of this providing a minimum of 265 dwellings per annum. This would support a reasonable and expected level of job growth throughout the plan period whilst enabling a reduction in out-commuting, would sustain development at a level that has recently been achieved in the Borough, enable a more positive contribution to be made to the delivery of affordable housing as needed across Rossendale and reflect a range which was recently considered to be appropriate and sustainable by the Council.

Housing land supply

It is a critical requirement of the plan that it delivers, with certainty, a sufficient supply of homes, in accordance with NPPF (paragraph 59). Local Plans must identify a supply of developable land to achieve this over the plan period (paragraph 67).

The PSLP seeks to achieve this through allocation of sites for development and reliance on various sources of supply. In this case, Peel does not consider the sources of land

identified by the Council to be capable of delivering the numerical requirements of the PSLP even based on an annual housing requirement of 212 units per annum, which Peel believes to be below the proper requirement. Collectively this does not present a developable supply of land to the level assumed by the Council.

Peel's analysis has demonstrated that the realistic developable supply identified by the Council is 2,102 units. Based on different requirement scenarios, this would present a shortfall against the requirement as follows:

- a) 1,078 units based on 212 units per annum between 2018 and 2034;
- b) 1,873 units based on 265 units per annum between 2018 and 2034;
- c) 1,502 units based on 212 units per annum between 2018 and 2036;
- d) 2,403 units based on 265 units per annum between 2018 and 2036.

Peel considers that the Local Plan should be progressed on the basis of a housing requirement of 265 units per annum and should cover the period to 2036 (scenario d above). Having regard to the realistic developable supply, a shortfall in housing land supply of 2,403 against the proper Local Plan requirement would exist.

This shortfall would increase to 2,854 when a flexibility allowance of 10% is applied to the overall requirement (increasing this to 4,955) or to 3,079 based on a 15% flexibility (bringing the total requirement to 5,181 units) as also proposed by Peel for the reasons explained.

The Local Plan will therefore need to find an additional source of land to meet this residual requirement if it is to progress on a sound basis. This will need to be met exclusively through the release of land in the Green Belt and open countryside.

As a result the above, the PSLP as presented does not satisfy paragraph 67 of the NPPF. This aspect of the plan is not consistent with national policy and is unsound therefore. Further, the inadequacy of the housing land supply means that the PSLP is not effective in meeting the development needs of the Borough, raising a further critical point of soundness.

In order to correct soundness, a further supply of developable land capable of providing an additional c3,000 residential units needs to be identified by the Council and allocated for development through the Local Plan. This should include Peel's land holdings at Haslam Farm, Moorland Rise and Burnley Road each of which have been proven to present suitable and deliverable development opportunities capable of delivering affordable housing through previous submissions to the Local Plan.

Safeguarded land

Contrary to the prevailing evidence and guidance in the NPPF, the Council has failed to properly consider the need to release further land from the Green Belt for safeguarding purposes and to provide a supply of land to call on to meet the Borough's development needs beyond the plan period. The Council's approach means that a further review of the Green Belt is likely to be required as part of the development of the next Local Plan, undermining the long term permanence of the Green Belt as is its defining characteristic (NPPF paragraph 133).

The failure to make adequate provision for safeguarded land presents a conflict with national policy, including paragraphs 133 and 139 of the NPPF. This aspect of the PSLP is unsound as a result.

The Sustainability Appraisal

A deficient Sustainability Appraisal process has been pursued which does not satisfy the requirements of the Strategic Environmental Assessment (SEA) Directive. Principally the SA process has failed to demonstrate that the PSLP represents the most sustainable approach when considered against reasonable alternatives.

Most notably, the SA concludes that an option of delivering 5,000 residential units, rather than 3,180 as proposed, represents the most sustainable approach to growth. The Council has selected a growth option that is contrary to the findings of the SA therefore.

Furthermore, the SA does not allow the relative sustainability of different options for the spatial distribution of development across the Borough to be considered insofar as each is considered in the context of an associated housing requirement which varies by spatial option. As such, one approach to distribution cannot be independently assessed, in terms of its inherent sustainability, relative to another.

The SA cannot be relied upon in its current form and does not meet the relevant legal and procedural requirements as a result. This deficiency also means that the PSLP's evidence base is also deficient. The PSLP is unsound as a result in not being justified.

Site specific comments

Peel's representations to the Local Plan, and prior to that the Core Strategy, have made the case for the allocation of its land holdings for residential development. Evidence has been shared with Rossendale Council which demonstrates that each site represents a sustainable and deliverable development opportunity, able to contribute to meeting the development needs of the Borough, including the need for high quality family housing and affordable homes.

In the context of the critical deficiencies identified in the PSLP, Peel would reiterate that its land holdings at Moorland Rise, Haslingden (c 110 units); Burnley Road, Edenfield (c 38 units); and Haslam Farm, Rawtenstall (c 155 units) should be allocated for residential development through the Local Plan. This will go some way to addressing the points of soundness raised.

The previous draft version of the Local Plan proposed the allocation of part of Peel's land at Haslam Farm for residential development. This allocation has not been carried forward into the PSLP. The Council has provided no evidence to support this position, aside from the suggestion of the site being affected by additional constraints that have not previously been considered. In response, Peel has presented a revised development framework for this site which demonstrates that the site can still accommodate around 155 residential dwellings allowing for a sufficient easement to the Haweswater Aqueduct which runs beneath the site.

Peel fully supports the PSLP's proposed allocation of Peel's land holdings at Blackburn Road, Edenfield and Kirkhill Avenue, Haslingden for residential development over the plan period.

Comments on other policies

A number of amendments to detailed policies are set out in this representation. These are required to ensure that the policy requirements do not unduly constrain future development proposals and in order that these policies satisfy the requirements of NPPF.

Correcting soundness

A number of steps need to be taken by the Council in progressing the Local Plan and before it is submitted for examination. These are critical to the ability of the plan to be found sound. These can be summarised as follows:

- Extend the plan period to 2036 such that it covers at least a full 15 year period from adoption;
- Adjust the plan's housing requirement to 265 dwellings per year, with a resultant 17 year requirement of 4,505 units to 2036, plus an appropriate flexibility allowance of between 10 and 15% to safeguard against under delivery;
- Redefine the spatial strategy for the Borough (as articulated through Strategic Policy SS) such that Rawtenstall is identified as a 'Strategic Service Centre' in its own tier reflecting its role and importance in the Borough;
- Seek to deliver a higher proportion of the overall housing requirement in Rawtenstall, reflecting its role and status as the most sustainable location for growth and consistent with the Core Strategy, and in the west of the Borough more generally where development, including affordable housing, is viable, ensuring that the numerical housing requirements of the plan to be achieved;
- Identify and allocate further housing sites to deliver an additional c3,000 homes over the plan period (to 2036) reflecting the extended plan period, the increased annual housing requirement and the realistic developable supply from the sources identified through the PSLP. In this context, Peel's land holdings at Burnley Road, Edenfield; Moorland Rise, Haslingden; and Haslam Farm, Rawtenstall represent sustainable and developable sites for residential development and should be allocated as such in the Local Plan;
- Allocate safeguarded land (removed from the Green Belt) to contribute to meeting the Borough's development requirements beyond the plan period and to avoid the need for a further Green Belt review as part of a future review of the plan. This should be based on rolling forward the housing need requirement over a 15 year period and replicating the split between Green Belt and non-Green Belt land in delivering this over the plan period. This would require around 19 ha of land (equivalent to approximately 500 residential units) to be safeguarded for residential development beyond the plan period if the PSLP housing requirement and supply were taken as read. In reality, the safeguarded land requirement will be significantly higher than this since:
 - a) The proper annual housing requirement is higher than proposed in the PSLP;

b) The total proportion of the overall housing requirement to be met through the release of land from the Green Belt is significantly higher than assumed by the Council and expressed through the PSLP due to deficiencies in the developable supply identified through these representations.

1. Introduction

1.1 This representation is prepared by Turley on behalf of Peel Holdings (Land & Property) Limited (hereafter “Peel”). It provides comments to Rossendale Borough Council (RBC) on the Pre-Submission Publication Version of the Rossendale Draft Local Plan (August 2018) (‘PSLP’) which is currently the subject of public consultation.

Peel Group

1.2 The Peel Group is a major investment company and is one of the leading infrastructure, real estate, transport and investment enterprises in the UK. Its diverse network of businesses ranges from ports to airports; land to leisure; media to hotels; wind farms to shopping centres, nature parks to canals, residential sites to agricultural uses.

1.3 Peel’s track record is one of delivering transformation and creating vibrant places through regeneration and innovation. Peel invests for the long term. For example, at MediaCityUK in Salford Peel delivered a £650 million investment in Europe’s largest construction project during the recession. Its’ £400 million investment in the Port of Liverpool opening up new export markets for the North.

Peel Land and Property

1.4 Peel has extensive real estate assets which consist of 1.2 million sq m (13 million sq ft) of investment property and over 15,000 hectares (37,000 acres) of strategic land and water throughout the UK, with particular concentrations in the North West of England, Yorkshire and the Medway. The breadth of Peel Land and Property’s assets covers transformational developments including MediaCityUK and Liverpool Waters. Its’ landholdings accommodate offices, retail and business parks, shopping centres, leisure and sports venues, residential developments and agricultural land.

Scope of representations

1.5 This report forms part of a suite of documents which collectively comprise Peel’s response to the PSLP and accompanying background documents published. The full suites of documents submitted is as follows:

- Paper 1: Overarching Representation (this report)
- Paper 2: Assessment of Housing Needs
- Paper 3: Critique of Housing Land Supply
- Paper 4: Identification of Safeguarded Land Requirements

1.6 Peel has also historically provided Rossendale Council with a series of site-specific representations in respect of its various land interests in the Borough and their proposed treatment through the development of the Local Plan and, prior to this, the Core Strategy. These sites are known to RBC and are as follows:

- Land at Kirkhill Avenue and Moorland Rise, Haslingden
- Land at Haslam Farm, Rawtenstall
- Land at Blackburn Road, Edenfield
- Land at Burnley Road, Edenfield

1.7 These sites represent sustainable development opportunities able to make a contribution to meeting the Borough’s housing requirements, including the provision of high quality family homes and affordable housing in accordance with local needs. Their allocation for development is justified in the context of the critical points of soundness raised within this representation. Whilst not sufficient on their own to correct soundness, they would go some way to doing so in addressing the significant housing land supply gap which this representation has identified.

1.8 Development Framework for these sites have previously been submitted to the Council, in 2013, with additional supporting technical information submitted in 2015 and 2017. These submissions demonstrate that each site represents a sustainable development opportunity and outlines how the sites could be delivered over the plan period.

1.9 For completeness, updated Development Framework plans for each site are provided with these representations at Appendix 2.

1.10 These representations provide comments on the soundness of the plan, in accordance with the requirements of paragraph 35 of the NPPF. They are provided following a full review of the PSLP and the evidence base which has informed this.

1.11 Whilst Peel supports the progression of the Local Plan, a number of critical points of soundness are raised within these representations. The Council is urged to act on these points before the PSLP is progressed to submission. It is Peel's view that a failure to do so will result in the PSLP being found to be unsound at Examination. The key issues raised in this regard are as follows:

- The plan does not aim to meet the Borough's proper housing need and so does not meet the requirements of paragraph 59 and 65 of the NPPF;
- The plan sets out an unsustainable and unjustified spatial strategy, with an overprovision of housing within the eastern parts of the Borough, most notably at Bacup, at the expense of Rawtenstall which is proven to be the most sustainable location to accommodate growth. The spatial strategy cannot be justified therefore;
- The spatial strategy advanced undermines the deliverability of the plan in placing an over reliance on development being brought forward in a location where viability is marginal. The plan is not effective therefore;

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- The spatial strategy will result in an under provision of affordable housing relative to need through directing a disproportionate level of housing development to those parts of the Borough where it cannot be viably delivered. The plan fails to meet the requirements of paragraphs 59 of the NPPF;
- The Council has overestimated the realistic developable supply of housing from the sources identified and relied upon. The PSLP does not demonstrate a 15 year developable supply of housing land, contrary to the requirements of paragraph 67 of the NPPF;
- The plan fails to make adequate provision for safeguarded land to meet potential development requirements beyond the current plan period and to ensure the Green Belt can endure over the long term, contrary to the requirements of paragraphs 133 and 139 of the NPPF;
- A deficient Sustainability Appraisal has been undertaken which does not test reasonable alternatives to the PSLP, nor has it demonstrated that the PSLP represents the most sustainable option compared to reasonable alternatives. It does not meet the legal requirements of the Strategic Environmental Assessment (SEA) Directive therefore.

1.12 A number of measures are needed to correct these points of soundness, including identifying an additional supply of developable housing land and allocating this in the plan. This must be focused within the western part of the Borough, including Rawtenstall.

Structure of representations

1.13 This is Paper 1 of Peel's representations to the Pre-submission Local Plan. It provides a detailed response to the content and policies set out within the Pre-submission Local Plan. It is structured as follows:

- Section 2: considers the length of the plan period proposed
- Section 3 considers the proposed spatial strategy and distribution of residential allocations throughout the Borough
- Section 4: considers the housing needs of the Borough
- Section 5: considers the extent to which the Local Plan identifies a developable supply of land to meet its housing requirements
- Section 6: provides comments on the need for safeguarded land to meet development requirements beyond the plan period
- Section 7: considers the Sustainability Appraisal and whether the Council has considered reasonable alternatives to the Pre-submission Local Plan
- Section 8: Provides specific comments on sites proposed for allocation by Peel and their treatment through the Pre-submission Local Plan
- Section 9: Provides comments on other policies of the Pre-submission Local Plan which are not covered in sections 1 to 7
- Section 10: Provides summarising comments and sets out changes needed to correct the critical points of unsoundness outlined in Peel's representations

1.14 All comments in Paper 1 should be read in the context of the other papers submitted by Peel.

1.15 Whilst Peel's comments are restricted to the policies and aspects of the PSLP referred to within this representation report, Peel reserves the right to provide comments on other aspects of the plan and its evidence base, and to submit additional evidence in relation to the Local Plan and its soundness as part of future consultations.

2. The plan period

2.1 The NPPF makes clear that the strategic policies of a Local Plan should:

“...look ahead over a minimum 15 year period from adoption...” (paragraph 22)

2.2 This requirement has been substantially strengthened compared to the original NPPF (2012) which set out merely a ‘preference’ for Local Plans to be based on a fifteen year timeframe (paragraph 157).

2.3 The PSLP relates to a 15-year plan period, from 2019 to 2034. However, RBC’s current timetable³ for the Local Plan anticipates adoption in March 2020. If this is achieved it would mean that from the point of adoption there would only be 14 years of the plan period remaining. The DLP is therefore inconsistent with the requirement of the NPPF in this respect, such that it is unsound in accordance with the tests at paragraph 35.

2.4 Moreover, as is often the case, it is possible that there will be a delay in adoption. This is particularly the case with the DLP given the soundness concerns raised in this representation.

2.5 As such, it is necessary that the plan period is extended. This extension should be by a minimum of one year and preferably by two years to guard against the likelihood of a further delay in the adoption of the Local Plan. This would result in a plan period from 2019 to 2035 or 2036. This will necessitate a commensurate increase in the housing requirement.

2.6 In light of the above, the plan period as proposed is not in accordance with national planning policy and is unsound as a result.

10. Correcting soundness

10.1 The PSLP will be subject to an independent examination into its soundness and legal compliance. The tests of soundness are presented in paragraph 35 of the NPPF. This notes that Local Plans are sound only if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy taking into account reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

10.2 This representation has outlined a number of critical areas of the PSLP where it does not satisfy the above tests of soundness:

- The plan is not positively prepared – it does not seek to meet the proper housing requirements of the plan which should be based on achieving 265 dwellings per year, not 212 as proposed, plus provision of an appropriate flexibility allowance to safeguard against under delivery;
- The plan is not justified – the spatial strategy results in an overprovision of planned development in the east of the Borough, particularly Bacup, and an under provision in the west, including Rawtenstall. This is contrary to the prevailing evidence which overwhelmingly demonstrates that Rawtenstall and West Rossendale is the most sustainable location for growth and the most viable location to deliver housing, including affordable housing. The selected spatial strategy has not been proven to represent a sustainable approach compared against reasonable alternatives;
- The plan is not effective – the PSLP does not identify a 15 year developable supply of housing land to meet the Borough’s proper housing needs. The housing requirements of the PSLP will not be met therefore.
- The plan is not consistent with national policy – it presents a number of fundamental conflicts with the NPPF including:
 - Not being based on a 15 year plan period (paragraph 22);
 - Under-estimating the level of housing needed over the plan period; (para 59 and 61);
- Selecting a spatial strategy which will exacerbate the existing and longstanding under provision and under delivery of affordable housing in Rossendale (paragraph 59);

- Not identifying a developable supply of land to meet the numerical housing requirements of the plan, even based on the Council's proposed (inadequate) requirement of 212 dwellings per annum (paragraph 67);
- Failing to direct development to the most sustainable locations (including Rawtenstall and West Rossendale) without express justification (paragraph 103);
- Not being informed by a legally compliant Sustainability Appraisal process (paragraph 32);
- Presenting policies (including in relation to the housing requirement, spatial strategy and distribution of development) which run counter to the prevailing evidence base without justification (paragraph 31);
- Not providing for safeguarded land to meet the development requirements of the Borough beyond the plan period (paragraph 139).

10.3 The PSLP has been informed by a defective Sustainability Appraisal process which does not allow the relative sustainability of the different growth and spatial options to be determined independently. The Sustainability Appraisal does not satisfy the Strategic Environmental Assessment (SEA) Direction and so the plan does not meet relevant legal and procedural requirements.

10.4 A number of steps need to be taken by the Council in progressing the Local Plan and before it is progressed to submission. These can be summarised as follows:

- Extend the plan period to 2036 such that it covers at least a full 15 year period from adoption;
- Adjust the plan's housing requirement to 265 dwellings per year, with a resultant 17 year requirement of 4,505 units to 2036, plus an appropriate flexibility allowance of between 10 and 15% to safeguard against under delivery;
- Redefine the spatial strategy for the Borough (as articulated through Strategic Policy SS) such that Rawtenstall is identified as a 'Strategic Service Centre' in its own tier reflecting its role and importance in the Borough;
- Seek to deliver a higher proportion of the overall housing requirement in Rawtenstall, reflecting its role and status as the most sustainable location for growth and consistent with the Core Strategy, and in the west of the Borough more generally where development, including affordable housing, is viable, ensuring that the numerical housing requirements of the plan to be achieved;
- Identify and allocate further housing sites to deliver an additional c3,000 homes over the plan period (to 2036) reflecting the extended plan period, the increased annual housing requirement and the realistic developable supply from the sources identified through the PSLP. In this context, Peel's land holdings at Burnley Road, Edenfield; Moorland Rise, Haslingden; and Haslam Farm, Rawtenstall represent sustainable and developable sites for residential development and should be allocated as such in the Local Plan.
- Allocate safeguarded land (removed from the Green Belt) to contribute to meeting the Borough's development requirements beyond the plan period and to avoid the need for a further Green Belt review as part of a future review of the plan. This should be based on rolling forward the housing need requirement over a 15 year period and replicating the split between Green Belt and non-Green Belt land in delivering this over plan period. This would require around 19 ha of land to be safeguarded for residential development beyond the plan period if the PSLP housing requirement and supply were taken as read. In reality, the safeguarded land requirement will be significantly higher than this since:
 - a) The proper annual housing requirement is higher than proposed in the PSLP;
 - b) The total proportion of the overall housing requirement to be met through the release of land from the Green Belt is significantly higher than assumed by the Council and expressed through the PSLP due to deficiencies in the developable supply identified through these representations.

Appendix 1: East Lancashire Bus Network Plan

Appendix 2: Updated Development Framework plans relating to Peel's landholdings

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference	5163 Ms	Emily	Hrycan	Historic England	Number of supporters:
Commenting on			General		
Is the Local Plan legally compliant?	Did not answer	Is the Local Plan sound?	Did not answer	Does the Local Plan complies with the duty to co-operate?	Did not answer

Dear Sir

Publication version of the Local Plan for Rossendale (Regulation 19) Consultation

Thank you for consulting Historic England on the above.

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.

Historic England has produced a number of good practice advice notes* on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (<http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) may be useful in the production of your Plan.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5168****Adam****Brennan****United Utilities**

Number of supporters:

Commenting on

General

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir / Madam,

Rossendale Borough Council – Publication of Pre-Submission version of the Local Plan Consultation

Thank you for seeking the views of United Utilities as part of the Development Plan process. United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information.

This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

When preparing the Development Plan and future policies, we can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.

General Comments

United Utilities wishes to highlight that we will seek to work closely with the Council during the Local Plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations. United Utilities will continue to work with the Council to identify any infrastructure issues and appropriate resolutions to new development.

United Utilities wishes to make the following comments in connection to the current consultation. These comments should be read in conjunction with our previous correspondence throughout the Local Plan process.

We wish to highlight our free pre-application service for applicants to discuss and agree drainage strategies and water supply requirements. We cannot stress highly enough the role the council can play in highlighting the importance of drainage strategies prior to application stage. Developers should be contacting us as early as possible in the planning process. Enquiries are encouraged by contacting:

Developer Services - Wastewater

Tel: 03456 723 723

Email: WastewaterDeveloperServices@uuplc.co.ukWebsite: <http://www.unitedutilities.com/builder-developer-planning.aspx>

Developer Services – Water

Tel: 0345 072 6067

Email: DeveloperServicesWater@uuplc.co.ukWebsite: <http://www.unitedutilities.com/newwatersupply.aspx>

Infrastructure provision

We note that the draft Local Plan is allocating a mix of Greenfield and Brownfield sites. It is typical of such Greenfield sites to have little or no existing infrastructure. Through previous correspondence, the Local Planning Authority will be aware which growth highlighted in the Local Plan needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to housing delivery. Providing supporting infrastructure to Greenfield development sites could result in the need to upsize the existing assets to support growth. We would encourage the need for a co-ordinated approach to phased development in line with any supporting infrastructure works, and for developers to contact as early as possible using the above details.

With regards to the growth in all settlements, UU appreciates the inclusion of trajectory information and would encourage updated information as soon as it becomes available.

Summary

Moving forward, we respectfully request that you continue to consult with United Utilities for all future planning documents. We are keen to continue working in partnership with Rossendale Borough Council to ensure that all new growth can be delivered sustainably, and with the necessary infrastructure available, in line with the Council's delivery target. This includes providing further policy explanation in relation to what is mentioned in this representation.

In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5169****ASDA**

Number of supporters:

Commenting on

General

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir/Madam,

ROSSENDALE DRAFT LOCAL PLAN PRE-SUBMISSION PUBLICATION VERSION REGULATION 19 CONSULTATION (2019-2034)
REPRESENTATIONS ON BEHALF OF ASDA STORES LTD

Introduction

On behalf of our client, ASDA Stores Limited, please accept this letter as representations to the Rossendale Local Plan Pre-Submission Publication Draft (2019-2034). These representations are made in respect of ASDA's land interests in the borough which include the ASDA Rawtenstall Superstore on Holly Mount Way.

At the outset, we note that the Council have not provided a definitive date as to when the Local Plan will be submitted to the Secretary of State for Examination other than to suggest it will be submitted at some point in January/February 2019. As the regulation 19 consultation is asking for comments as to whether or not the Publication Draft plan is 'sound', there is therefore a need to confirm as to which version of the NPPF we are being asked to consider the plan's compliance with.

As the authority will be aware, Paragraph 214 at Annex 1 of the updated NPPF (2018) confirms that policies in the previous Framework (2012) will apply for the purposes of examining plans where those plans are submitted on or before 24th January 2019. In the absence of any confirmation within the consultation documents, we have assumed that the Local Plan will be submitted after this date and therefore the updated NPPF (2018) remains the relevant framework when considering the matter of soundness. We reserve the right to provide further comment in the event that the local planning authority submit the plan for examination on or before 24th January 2019.

Agent of Change

This comment does not relate to a specific policy within the draft Rossendale Local Plan however we wish to make a more general comment with regards the 'Agent of Change' principle within the new NPPF (2018) at paragraphs 182 and 183. These paragraphs have been included to protect existing development and ensure that new development sufficiently mitigates any proposed impacts. By not reflecting this principle within the emerging Local Plan is unjustified and is not consistent with national policy. As such, we consider the plan to be unsound in this regard.

In line with paragraphs 182 and 183 of the newly revised NPPF, ASDA encourage the Council to include a policy with reflects the Agent of Change Principle. These paragraphs state;

'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities'.

Many Local Authorities throughout the country are including policies within their Local Plan to reflect this principle in the NPPF. For example, the draft London Plan has a draft policy 'D12 Agent of Change'. The Agent of Change principle places the responsibility on the new development to provide suitable mitigation before the development is complete.

For a new development adjacent to an existing business, the responsibility should be placed firmly upon the new development to ensure that the occupants are not affected by the noise emanating from the existing operation.

ASDA fully endorse the agent of change principle and encourage Rossendale Borough Council to include a specific local policy in their emerging Local Plan.

13 December 2018

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Summary

The consultation invites responses to this publication draft and in summary, these representations highlight that:

- The ASDA Rawtenstall should be retained in the town centre boundary;
- The Primary Shopping Area (PSA) should be extended to include the ASDA superstore;
- An Agent of Change policy should be incorporated into the emerging Local Plan.

We trust the above representations are clear but should you have any questions, please do not hesitate to contact me. Otherwise, please keep us informed of any further consultation on then emerging Rossendale Borough Council Local Plan and associated documents, using the contact details below.

Do you wish to participate to the Examination In Public?	Did not answer	Reasons
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Reference **5170 Mr****Melanie****Lindsley****The Coal Authority**

Number of supporters:

Commenting on

General

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Background on the Coal Authority

The Coal Authority is a Non-Departmental Public Body sponsored by the Department for Business, Energy & Industrial Strategy. The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The main areas of planning interest to the Coal Authority in terms of policy making relate to:

- The safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales;
- The establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Minerals Planning Policy Wales and MTAN2 in Wales; and
- Ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework and Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales and MTAN2 in Wales.

Background on Coal Mining Issues in Rossendale

Surface Coal Resources, Development and Prior Extraction

As you will be aware, the Rossendale area contains coal resources which are capable of extraction by surface mining operations. These resources cover approximately 36.55% of Rossendale.

The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.

Coal Mining Legacy

As you also will be aware, Rossendale has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas.

Within the plan area there are approximately 851 recorded mine entries and around 148 coal mining related hazards have been reported to The Coal Authority. A range of other mining legacy features are present including a mine gas site, past surface coal mining, recorded shallow coal workings and unrecorded shallow coal workings..

In total The Coal Authority High Risk Development Area covers approximately 19.59% of the Council area. Mining legacy is therefore a significant issue in the context of Rossendale.

Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. No development should take place over mine entries even when treated.

Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not always a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. The presence of mine entries can be a constraint as new development should not be permitted over or within the influencing distance of a mine entry.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

Comments – The Coal Authority is pleased to see that the Mineral Safeguarding Area is identified on the Policies Map.

We are also pleased to see that it is explicit within the introduction text that the Local Plan does not cover minerals and waste planning as this is the responsibility of Lancashire County Council and that the adopted Joint Lancashire Minerals and Waste Local Plan forms part of the development plan for Rossendale

Conclusion

The Coal Authority welcomes the opportunity to make these comments. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5173****Taylor Wimpey**

Number of supporters:

Commenting on

General

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

LAND AT GRANE ROAD, HASLINGDEN

1. INTRODUCTION

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representations to the Rossendale Draft Local Plan Consultation, which ran between 23rd August and 5th October 2018.

Taylor Wimpey's Land Interests

1.2 Taylor Wimpey are pursuing various interests within the Rossendale Local Authority Area and have made separate site specific representations on the following sites:

- Grane Village, Helmshore (Draft Allocation H74); and
- Land West of Market Street, Edenfield (Draft Allocation H72).

1.3 Accordingly, this document provides general comments on the consultation and supporting evidence base involving the land at Grane Village, Helmshore.

1.4 At the outset, it must be noted that whilst the Grane Village site technically falls within the ward of Helmshore (with Grane Road itself forming the ward boundary); in reality it is more closely related to the larger settlement of Haslingden. This is because, whilst Haslingden and Helmshore are practically equidistant from the site, Haslingden has a greater level of facilities, particularly in terms of retail and healthcare services, and Grane Road provides a direct main road link to those facilities. Therefore, future residents of the Grane Village site will be more likely to use the shops and services in Haslingden than Helmshore, and as such this site is considered as an extension to Haslingden.

Representation Structure

1.5 The structure of these representations takes the following form:

- In Section 2 we provide general comments on the various strategic and development control policies (which are largely duplicated across both representations, with some site specific references).
- In Section 3 we make site specific comments on Grane Village which is divided into 3 subsections:
 - i. Outlining the site's current status.
 - ii. Assessment of the evidence base documents concerning Grane Village.
 - iii. Conclusions on Grane Village.
- In Section 4 we provide our overall conclusions on the draft plan and allocation of the Grane Village site.

2. STRATEGIC AND DEVELOPMENT CONTROL POLICIES

2.1 This section comments on the strategic and development control policies in the Draft Plan, how the allocation of the Grane Village site for residential purposes upholds these objectives, and justifies the requested amendments where necessary.

Conclusions on Strategic and Development Control Policies

2.105 Overall, Taylor Wimpey are supportive of the Draft Plan, subject to the comments and suggestions above.

LAND WEST OF MARKET STREET, EDENFIELD

1. INTRODUCTION

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representations to the Rossendale Draft Local Plan, Pre-Submission Publication Version, Regulation 19 Consultation, which ran between 23rd August and 5th October 2018.

Taylor Wimpey's Land Interests

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1.2 Taylor Wimpey are pursuing various interests within the Rossendale Local Authority Area and have made separate site-specific representations on the following sites:

- Land West of Market Street, Edenfield (Draft Allocation H72); and
- Grane Village, Helmshore (Draft Allocation H74).

1.3 Accordingly, this document provides general comments on the consultation and supporting evidence base involving the land to the west of Market Street, Edenfield.

Representation Structure

1.4 The structure of these representations takes the following form:

- In Section 2 we provide general comments on the various strategic and development control policies (which are largely duplicated across both representations, with some sitespecific references).

- In Section 3 we make site specific comments on Market Street, Edenfield, which is divided into 3 subsections:

i. Response to the requirements of Policy HS3: Edenfield

ii. Assessment of the evidence base documents concerning Market Street, Edenfield

iii. Conclusions on Market Street, Edenfield

- In Section 4 we provide our overall conclusions on the draft plan and allocation of the Market Street, Edenfield site.

2. STRATEGIC AND DEVELOPMENT CONTROL POLICIES

2.1 This section comments on the strategic and development control policies in the Draft Plan, how the allocation of the Market Street, Edenfield site for residential purposes upholds their objectives, and justifies the requested amendments where necessary.

Conclusions on Strategic and Development Control Policies

2.92 Overall, Taylor Wimpey are supportive of the Draft Plan, subject to the comments and suggestions above

Do you wish to participate to the Examination In Public?

Did not answer

Reasons

Reference **5176 Mr****Warren****Hilton****Highways England**

Number of supporters:

Commenting on

General

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Thank you for inviting Highways England to comment on the Pre-Submission version of the emerging Rossendale Local Plan.

Highways England is charged with operating, managing capacity, maintaining and improving England's motorways and major A roads, which form the Strategic Road Network (SRN). The SRN in Rossendale comprises the northernmost stretch of the M66 motorway and the A56 corridor; from a point south of M66 Junction '0', to a point north of the A56 roundabout junction with the A680 at Rising Bridge. This north-south corridor is a route of regional significance that links Greater Manchester with Lancashire.

It is an ambition to ensure that major roads are more dependable, durable, and most importantly – safe.

Highways England's desire to be a proactive planning partner goes beyond this statutory role but follows the spirit of the Licence which states that Highways England should: "support local and national economic growth and regeneration".

Highways England Comments – Local Plan evidence

The following documents have been prepared as part of the transport evidence base supporting the emerging Local Plan:

- Interim Rossendale Employment Sites Study, August 2018; and
- Technical Note on Phase One of the Highway Capacity Study, January 2018.

Highways England Comments - Publication Pre-Submission version of the Local Plan, Policies Map and Errata

In terms of transport and connectivity, 'The Plan' states the intention is to address issues affecting key road junctions, such as the Gyratory in Rawtenstall and enhancing the A56 corridor. It also identifies the option to develop the heritage East Lancashire Railway as a commuter rail link, which would provide an alternative mode for SRN journeys between Rawtenstall and the north of the Greater Manchester conurbation. Highways England welcomes the inclusion of sustainable modes of travel to reduce private vehicle usage and look forward to more fully understanding the impact this may have in reducing the number of trips on the SRN in Rossendale.

Interim Rossendale Employment Sites Study, August 2018

Highways England has been actively engaging with the Council on the preparation of the Interim Rossendale Employment Sites Study being prepared by Mott MacDonald. The interim study reviews the access requirements for key employment allocation sites on behalf of Rossendale Borough Council.

An updated report, addressing the comments raised by Highways England and Lancashire County Council (LCC), was expected during the consultation period. However, at the time of preparing this response, the updated report was received from Rossendale Council three days prior to the consultation deadline, and so will now need to be responded to separately by Highways England. Therefore, our response to the Local Plan Publication consultation is based on the transport evidence already available at the time of writing.

A summary of the findings of the Interim Rossendale Employment Sites Study, and our comments in relation to the impact of the proposed accesses on the SRN, is provided below: (Please see specific sites)

Highways England has concerns that the Interim Rossendale Employment Sites Study (and indeed the wider emerging Local Plan evidence) does not sufficiently address the constraints at a number of the proposed sites that fundamentally threaten the viability of the sites. Consequently, there is a likelihood that these allocations are fundamentally unviable, which is why there is a need for the Council to assess whether including them within the plan is realistic. Primarily, this relates to public safety and geotechnical matters. These are discussed in more detail, below for each location: (Please see specific sites)

We would welcome the opportunity to continue to work with the Council as it completes these assessments and to develop and review the updated employment site study/feasibility/modelling work. Until all of this work is complete, Highways England does not consider the transport evidence is sufficient to determine the accessibility of allocated sites or that appropriate mitigation measures have been identified to address the potential highway impact of the 'The Plan' on the SRN.

As such, at this stage, Highways England does not consider that there is robust transport evidence to support the inclusion of these sites within the Local Plan. Due to the safety issues associated with the sites referred to above, we advise that the Plan should not be advanced further at this stage until this work has been completed and its findings acted

upon.

We therefore welcome continued engagement with the Council to try and resolve the matters relating to access for these sites ahead of the subsequent submission and examination of the Publication document by an Independent Inspector.

Highways England Concluding Comments

The Localism Act 2011, placed the responsibility of 'Duty to Cooperate' on local authorities, to ensure that any local or cross-boundary impacts have been fully considered and addressed appropriately in preparing the Local Plan. The local authority must demonstrate that they have discussed such matters with the relevant bodies, including Highways England.

Highways England note that the Rossendale Local Plan is at an advanced stage and is the version of the plan the Council intends to submit for examination and then adopt. According to NPPG an assessment of the transport implications should be undertaken at several stages in preparing the Local Plan. It should be an iterative process that becomes more refined through the process itself and ultimately shaping its development rather than retrospectively trying to retrofit it to the development strategy. We note and welcome the commitment of the Council to ensure that a comprehensive, detailed transport evidence is made available prior to the EiP, and as such (at this stage) we do not wish to be heard at the Examination. However, we expect to be consulted on the updated Interim Rossendale Employment Sites Study (including the required site geotechnical assessments set out above) and the phase two Rossendale Local Plan Highway Capacity Study, to have confidence that the Local Plan can be sustainably delivered. Due to the constraints posed by the unique topography and geology of the Rossendale Valley through which the A56 runs, the Council does need to place more emphasis on these aspects as part of its evidence base for the purposes of ensuring future public safety.

We would request that we be notified of any of the following:

- The Rossendale Local Plan has been submitted to the Secretary of State for independent examination;
- Publication of the recommendations of any person appointed to carry out the independent examination of the Rossendale Local Plan; and
- Adoption of the Rossendale Local Plan.

It is recommended that growth is planned in sustainable locations that can be accessed by all modes of transport. Highways England supports this view as planned growth cannot simply be reliant on the availability of capacity on the SRN for future access and travel needs, particularly for local trips. We would welcome continued engagement with the Council to ensure that the transport impacts of planned growth are appropriately assessed and considered in respect of the SRN. Also, to ensure that alternative sustainable transport options are made available in the right place at the right time to cater for local trips and forecast demand associated with planned development.

We welcome the inclusion of well-founded, sustainable transport schemes in the Local Plan, and would welcome the opportunity to work collaboratively with the Council to understand the impact of both the proposed highway/junction access and public transport schemes on the future safe operation of the SRN, and their ability to support planned growth in the area to 2034 and beyond.

We hope that these comments are useful. If you would like to discuss any aspect of this letter, please contact me.

Updated comment:

We would welcome the opportunity to continue to work with the Council as it completes these assessments and to develop and review the updated site access, geotechnical assessments, feasibility and traffic impacts evidence. Until all of this work is complete, Highways England does not consider the Council's evidence base is sufficient to determine the accessibility of allocated sites or that appropriate mitigation measures have been identified to address the potential highway impact of the emerging Plan upon the SRN.

At this stage, Highways England therefore does not consider that there is robust evidence to support the inclusion of these sites within the Local Plan. Due to the safety issues associated with the sites referred to above, we advise that the Plan should not be advanced further at this stage until this work has been completed and its findings acted upon.

We therefore welcome continued engagement with the Council to try and resolve the matters relating to access for these sites ahead of the subsequent submission and examination of the Publication document by an Independent Inspector.

Do you wish to participate to the Examination In Public? **No**

Reasons

Reference **5188****Crystal Hurstwood**

Number of supporters:

Commenting on

General

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sirs,

ROSSENDALE DRAFT LOCAL PLAN – PRE SUBMISSION CONSULTATION

Thank you for the opportunity to submit comments as part of the consultation on the pre-submission draft Rossendale Local Plan. As you are aware, we act for Crystal Hurstwood and have been promoting various sites in Rossendale for residential development over recent years as part of the ongoing consultation process on the new Local Plan.

In June 2013, in response to the Green Belt and Urban Boundary Review consultation, we submitted a range of detailed development framework reports setting out how sites at Johnny Barn Close, Union Road and Hurst Lane could be sustainably delivered to provide much-needed new housing in the Borough.

In September 2015 we submitted further comments to the 'Local Plan Part 2: Site Allocations and Development Management Policies' document. This document was then abandoned in favour of the production of a new Local Plan. Accordingly, in October 2017 we submitted comments as part of the last round of consultation on the new Local Plan.

In parallel with the production of the new Local Plan we have held a number of meetings with the Council and submitted two planning applications for the sites at Johnny Barn Close and Hurst Lane. The land at Hurst Lane now has planning permission for two dwellings (Ref: 2015/0308, granted on 22 June 2017). The land at Johnny Barn Close now has outline planning permission for 30 dwellings (Ref: 2015/0517, granted on 2 July 2018).

We have consistently engaged with the Local Plan process, and would now like to offer the following comments in relation to the latest pre-submission version of the draft Local Plan, insofar as it relates to the land in control of our client at Union Road.

Do you wish to participate to the Examination In Public? **Did not answer**

Reasons

Reference **5197 Mr Marcus Hudson Lancashire County Council** Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Statement of Community Involvement 2018

Throughout the process of the emerging Local Plan, The School Planning has been consulted with at the various stages requiring a formal response regarding education including each regulation stage.

Formal face to face meetings with planning officers and attending group that includes district planning officers from border districts and e-mail/telephone exchanges have been entered into, sharing information have been welcomed by School Planning.

The face to face meetings have enabled us the opportunity to provide up to date information of the education provision across the district. We have been able to discuss in detail emerging issues i.e. school expansion/closure, migration, financial/land contributions and any strategies to mitigate the impact. It is accepted that all councils are required to evidence their Duty to Cooperate. We consider this to be a good working practice and the sharing of information has been open and transparent.

As indicated in the SCI consultation document there are great benefits to the engagement however, there are also weaknesses. Staff resourcing at District and County Council level is under great financial pressure and the resources required to respond to requests have reduced over a number of years.

With a number of Local Plans and multiple developments across the county coming forward has made it difficult to respond to last minute requests. These include housing assessments, naming infrastructure projects for committee, attending local plan public examination and meetings at short notice.

Although it is the nature of The School Planning Team to assist planning authorities with queries and information sometimes at short notice request that a reasonable and practicable timescales are agreed at the point of enquiry to ensure that dedicated time is allocated to the matter, ensuring that the information requested is accurate and reflects the current position. In conclusion The School Planning Team appreciate the involvement and opportunity to respond and exchange information, supporting Rossendale Borough Council to achieve the next stages of the local plan adoption.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

General

Reference **43 Mr. Stephen Hughes** Number of supporters:

Commenting on

General

General

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **No**

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 28

Habitat Regulations Assessment

Comments on policy HRA Habitat Regulations Assessment

Reference **5172 Mr Alex Rowe** **Natural England** Number of supporters:

Commenting on Habitat Regulation Assessment - Appropriate Assessment

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Habitat Regulations Assessment - Appropriate Assessment

Natural England are satisfied with the overall conclusion of the Appropriate Assessment (AA) but have some specific comments to make where we feel additional detail or further clarification is required.

The Habitats Regulations Assessment should ideally be presented as a whole and include the Screening stage so that it is clear how and why the AA was needed.

Table 5.7 Likely mitigating impact of Local Plan policies

Private Residential Garden Development – Whilst residential gardens bring many positive benefits, we disagree that they would have any bearing on sensitive bird areas.

Open Space Requirements in New Housing Developments – This should include areas suitable for dog walking in order to reduce pressure on bird sensitive areas.

5.10.6 – The AA is concluding no ‘likely significant effect’ (LSE) in-combination with other Plans/ Projects. This is confusing since LSE is the term used at Screening stage, this is an AA so the term that should be used is ‘adverse impact on site integrity’ (AIOSI). It is also a little confusing that the AA goes on to propose measures to mitigate for in-combination impacts. Rossendale do not need to include Plans/Projects that have concluded AIOSI ‘alone’ as they will be required to come up with measures to mitigate the impacts. Plans/Projects that conclude no LSE ‘alone’ do need to be included in the in-combination assessment. It is not clear if the other Plans/Projects in-combination assessments included accurate housing numbers for Rossendale or did that information become available at a later stage?

6.1.1 – ‘significant effect’ is the incorrect term to use in an AA. It is confusing to refer to mitigation when no adverse impact has been identified even though we support the proposed safeguarding measures.

It is not clear if the AA is concluding an in-combination impact.

Box 6.1 Mitigation recommendations

It is not clear if the mitigation recommendations are required in order to mitigate for in-combination impacts, some clarification is needed.

Visitor Management Strategy – If this is considered to be necessary in order to mitigate for in-combination impacts then some more detail is needed in order to provide confidence that this can be delivered. Details on progress and time lines should be provided.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 1

Local Development Scheme

Comments on policy LDS

Local Development Scheme

Reference **5119 Mr Richard Lester**

Number of supporters:

Commenting on Local Development Scheme

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer****A NON-COMPLIANT**

A1. Lack of conformity with LDS

A1.1 Section 19(1) of the Planning and Compulsory Purchase Act 2004 requires development plan documents to be prepared in accordance with the Local Development Scheme (LDS). If the Council does not have an approved LDS, it is impossible for any draft Local Plan to comply with section 19(1).

A1.2 A deficiency in the content of the LDS might render it impossible for the LP to comply with section 19(1).

A1.3 The question arises: Has the Council approved an LDS? Its purported LDS, entitled

“Local Development Scheme and Proposals Map Timetable (December 2016), is at

https://www.rossendale.gov.uk/download/downloads/id/13582/local_development_scheme.pdf

A1.4 The Council website states https://www.rossendale.gov.uk/info/210148/local_plan/10629/emerging_local_plan/3 :

Local Development Scheme (Local Plan Timetable)

The latest Local Plan timetable was agreed at the Council meeting held on Wednesday 14th December 2016. The timetable called Local Development Scheme is available to view [link to page mentioned in paragraph 1.3 above].

A1.5 The minutes of that Council meeting https://www.rossendale.gov.uk/download/meetings/id/8663/minutes_of_the_meeting_14th_december_2016 do not at any point use the expression “Local Development Scheme”. It is true that the document mentioned in paragraph A1.3 above was appended to the report and that the minutes recite that the Leader of the Council introduced the report and informed members of ‘the next stages in the process’ and ‘the outline of the timetable from two meetings ago’ and that ‘there was a need to revisit the timescales and therefore the timetable had changed’. However, the resolutions, as minuted, were simply:

1. That Council supports the publication of the draft Local Plan in mid-2017 for public consultation purposes.
2. All future minor amendments to the Plan to be delegated to the Planning Manager in consultation with the Portfolio Holder.

The stated Reason for Decision was:

The Local Plan is a key policy document for the Borough. It is important that it is evidence based (sic) to support the choices that will need to be made.

A1.6 There is nothing in that minute to suggest that members gave any consideration to the LDS beyond the date for regulation 18 consultation on the draft LP. There is therefore nothing to support the claim on the website that the LDS was approved on 14 December 2016.

A1.7 In August 2018 the Council was asked, pursuant to freedom of information legislation, to provide all minutes and/or records of decision(s) to approve their current LDS. In reply, under reference JW/FOI/6588, the Council provided links to the records of their Cabinet meetings in various months between July 2004 and February 2010 and of Full Council meetings in February 2005, August 2005, February 2007, February 2010, February 2012, December 2014, February 2016 and July 2018. Notably, the reply did not refer to the Council meeting of 14 December 2016., although it did contain also the link referred to at paragraph A1.3 above. This reply must be taken as confirming that, contrary to the claim on the Council website, there was no approval of the LDS on that date.

A1.8 The position is therefore either that there is no approved LDS or that the current LDS is actually the last one to be approved before December 2016. That is the document dated January 2016 and submitted to the Council meeting of 24 February 2016 https://www.rossendale.gov.uk/download/meetings/id/8247/f1_rossendale_local_plan , which is in similar format, but with different dates in its timetables, to the one dated December 2016.

The Council resolved https://www.rossendale.gov.uk/download/meetings/id/8304/minutes_of_the_meeting_24th_february_2016 to:

Agree the Local Development Scheme (LDS) as the timetable for production of the new Local Plan.

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The difficulty with treating the document dated January 2016 as the current LDS is that it is not readily available on the Council website, that it is not up-to-date and that the Council has publicised a different document as its LDS. Absent an LDS, it is submitted that it is impossible for the current draft LP to comply with section 19(1) of the Act of 2004.

A1.9 In case those submissions be not accepted, the following observations are made about the purported LDS, which apply equally to the versions dated January 2016 and December 2016. It refers to the LP and to Community Infrastructure Levy (CIL). CIL is not relevant for present purposes. As to the LP, all that the LDS contains is a coloured timetable and a similarly coloured key specifying the relevant regulations in the Town and Country Planning (Local Planning) (England) Regulations 2012.

A1.10 What an LDS is required by section 15 of the Act of 2004, but in Rossendale's case fails, to do is to specify the local development documents which are to be development plan documents and the subject matter and geographical area to which each development plan document is to relate. These matters cannot be left to inference - section 15 uses the word "specify".

A1.11 Having regard to the phraseology on the website, noted at paragraph A1.4 above, it is difficult to resist the conclusion that the Council hold the erroneous belief that the LDS and a plan production timetable are one and the same. The fact is that the latter is merely one component of the former.

A1.12 Even if there is an LDS that can be said to have been approved by the Council, it is submitted that its lack of specificity as to subject matter and geographical area make it impossible for the emerging LP to conform with it.

A1.13 If any one of the submissions in paragraphs A1.8 and A1.12 above is accepted, the draft LP must be considered to be not legally compliant and must be rejected.

Dear Sirs,

I forwarded to you today my representations about the Local Plan.

To amplify my comments therein about the Local Development Scheme (LDS), or lack thereof, I would refer to section 15(7) of the Planning and Compulsory Purchase Act 2004. This provides: to bring the scheme into effect, the local planning authority must resolve that the scheme is to have effect and in the resolution specify the date from which the scheme is to have effect.

The last time that the Council passed a resolution in compliance with section 15(7) was 29 February 2012 for an LDS for the period 2012 to 2015. That LDS is now well out of date. The draft Local Plan is not in compliance with any LDS and is therefore of no effect.

Do you wish to participate to the Examination In Public? **Yes**

Reasons

Number of comments in this section 1

Monitoring

Comments on policy **Monitoring** **Monitoring**

Reference **5157 Ms** **Joanne** **Harding** **Home Builders Federation** Number of supporters:

Commenting on Monitoring

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Monitoring

The monitoring section is not considered to be sound as it is not effective for the following reasons:

The monitoring section of the plan sets out several targets that will be monitored in relation to housing for example ‘how much housing (net) has been completed in the last 5 years?’. However, it does not contain any targets, timescales, trigger points or remedial actions. This is considered a failing in the effectiveness of the plan to deal with changing circumstances. In terms of housing, triggers for plan review could include the lack of a five-year supply or delivery which is below the anticipated housing trajectory. The HBF recommends that appropriate targets are introduced and that specific monitoring triggers are used, this will ensure that action will be taken when a target is not met.

Do you wish to participate to the Examination In Public? **Yes** Reasons

Reference **5176 Mr** **Warren** **Hilton** **Highways England** Number of supporters:

Commenting on Monitoring

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

The proposed targets in the Monitoring chapter of ‘The Plan’ are not aligned to any specific plan policy, and no targets are proposed to monitor the Local Plan’s impact upon transport and travel. Without data relating to travel and transport impacts, it will not be possible to set out a baseline or to measure the impacts of proposed development upon the SRN in Rossendale. Highways England recommends that transport and travel data is collected to measure the impact of ‘The Plan’ upon the performance of transport policies within the document. Without this data, it may be difficult to determine whether ‘The Plan’ is effective. However, it is recognised that it is a matter for each council to decide what to include in their monitoring reports, while ensuring they are prepared in accordance with relevant UK and EU legislation.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

New Policy

Comments on policy **New Policy** **New Policy**

Reference **5119 Mr Richard Lester**

Number of supporters:

Commenting on

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**

Does the Local Plan complies with the duty to co-operate? **Did not answer**

B3 Failure to consider use of compulsory purchase powers

B3.1 Where the Council has declined to take into account potential development sites where the landowner has other plans or is unwilling to develop, they have failed to consider, or failed to demonstrate that they have considered, using their compulsory purchase powers to ensure the proper planning of the area. This means that potential development sites have been omitted from the calculations of available sites and renders unsound the Policies based on those calculations. The Policies are those mentioned in paragraph B1.1 above.

Do you wish to participate to the Examination In Public? **Yes**

Reasons

The Former Regal Cinema

Reference **5192**

B&E Boys Ltd

Number of supporters:

Commenting on

The Former Regal Cinema

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

1. INTRODUCTION

1.1 Rossendale Borough Council (RBC) is preparing a new Local Plan which will guide the future planning and development of the area. The most recent consultation on the draft Local Plan was undertaken in summer 2017 and comprised the Regulation 18 stage; Hourigan Connolly submitted Representations on behalf of the B&E Boys Ltd relating to a number of matters. This Representation is submitted in response to the Council's current Publication Pre-Submission version of the Plan (Regulation 19). The consultation period runs from Thursday 23 August 2018 to Friday 5 October 2018. Once adopted the Local Plan will replace the adopted Core Strategy (2011).

1.2 Within the draft Local Plan, sites have been proposed for development (for housing, employment, retail uses etc), for environmental protection and for recreation uses, as identified on the Draft Policies Map. Changes are also proposed to the existing Green Belt and the Urban Boundary. Also, four additional Conservation Areas, along with an extension to an existing Conservation Area, are being considered.

1.3 There are a number of documents which form part of the Evidence Base in support of the Council's Publication Pre-Submission version document and where relevant, these have been considered and referred to in this Representation. For clarification, the Council's Errata to the Publication (Pre-Submission) version of the Local Plan (dated 03 September 2018), has been noted but it does not relate to the matters pertinent to this particular Representation.

BACKGROUND

1.4 Hourigan Connolly is instructed by B&E Boys Ltd to review and comment on the emerging Local Plan in relation to the site known as the Former Regal Cinema on the corner of Burnley Road and Hall Street in the centre of the town of Bacup. The site is not allocated for any specific use but is proposed to be located within the Bacup Town Centre Conservation Area (Strategic Policy ENV2: Heritage Assets) and Bacup District Centre retail area (Strategic Policy R1: Retail and other Town Centre Uses). This Representation sets out our support for the inclusion of the subject site within the Conservation Area and District Centre boundaries.

1.5 The matter is taken further however as the Representation will also set out how the Council should support the demolition of the existing building and that the site should be allocated for retail use.

1.6 The extent of the boundary of the site is provided at Appendix 1 to indicate the location of the site within Bacup, but Figure 1.1 is shown below for assistance. The site is within single ownership, that being B&E Boys Ltd.

Figure 1.1 Approximate location of subject site, the Former Regal Cinema, Burnley Road, Bacup (circled in red).

1.7 The 0.05 ha site lies on the western side of Burnley Road and on the corner of Hall Street opposite the Bacup War Memorial Cenotaph. The large building dominates the street being set immediately at the back of the pavement adjoining, and in line with, the other buildings to the south which form a commercial frontage on Burney Road. To the immediate north of the site is a Grade II Listed Building, St Johns Church. To the south, Burnley Road leads to the roundabout on the A681 at the junction of Market Street, Yorkshire Street and St James Square.

1.8 The former Regal Cinema has sat vacant and unused for in excess of 40 years, with its most recent use being a bingo/dance hall back in the early 1970s. The current use class is D2 Assembly and Leisure. The building takes up the whole of the land which is within B&E Boys Ltd ownership.

1.9 The owners of the site wish to demolish the existing building and seek that the resultant land be allocated for an A1 Retail Use (Land Use Classes Order 1987 as amended) in the emerging Local Plan. This Representation will demonstrate the building's suitability for demolition and proposed retail use as the site does not make a positive contribution to the Bacup Town Centre Conservation Area and the alteration in the use class would enable better prospects of a new building. This specific allocation would not only make a positive contribution to the Conservation Area, but a positive contribution to a District Centre located on one of the key arterial routes in the Borough.

SCOPE

1.10 In preparing these submissions we have reviewed the Evidence Base which underpins the emerging Local Plan, as well as the Bacup Town Centre Conservation Area

Character Appraisal and Management Proposals Plan (2011) which was written by consultants on behalf of the Council and adopted by the Council for development control purposes from 02 December 2011.

OVERVIEW

1.11 The starting point for consideration of the emerging Local Plan document is the well-established principle embodied in Paragraph 158 of the National Planning Policy Framework (hereafter referred to as the Framework) that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

2. LEGISLATIVE & POLICY CONTEXT

INTRODUCTION

2.1 In this Chapter we set out the relevant legislative and policy context before going on to examine the Council's Local Plan document.

LEGISLATIVE CONTEXT

2.2 Part 2 of the Planning & Compulsory Purchase Act 2004 (As amended) deals with Local Development.

2.3 The RBC Local Plan is being brought forward following changes to the Development Plan making system in England which are set out in the Localism Act 2011. Part 6 Sections 109 – 144 of the Localism Act deal with Planning.

2.4 Following revocation of the North West Regional Strategy (RS) in May 2013, Council's such as RBC will set their own housing and employment targets against objectively assessed needs.

2.5 The Town & Country Planning (Local Planning) (England) Regulations (SI No. 767) came into force on 6 April 2012 and guide the preparation of Local Plans.

MINISTERIAL STATEMENTS

2.6 In his Written Statement of 23 March 2012 the then Minister for Decentralisation and Cities the Rt. Hon Greg Clark MP referred to a pressing need to ensure that the planning system does everything it can to help England secure a swift return to economic growth. He urged local planning authorities to make every effort to identify and meet the housing, business and other development needs of their areas.

2.7 The Framework (see below) was subsequently published on 27 March 2012 and urges local planning authorities to boost significantly the supply of housing.

2.8 In his Written Statement of 6 September 2012 the Secretary of State for Communities and Local Government the Rt. Hon Eric Pickles MP noted an increase in house building starts between 2009 and 2011 but said that there was far more to do to provide homes to meet Britain's demographic needs and to help generate local economic growth.

2.9 There can be no doubt that house building is a driver of the local economy besides providing homes for local people.

FRAMEWORK REQUIREMENTS

2.10 It is noted that a new Framework was published in July 2018, however this section refers to the Framework published in 2012 as we understand from the Council that the Plan will be submitted to the Inspector before 24 January 2019.1 Should that position change, we reserve the right to make further representations.

2.11 Paragraphs 150 to 185 of the Framework deal with Plan-making. The importance of the Local Plan is identified as the key to delivering sustainable development and a cornerstone of the development management process (Paragraph 150 refers).

2.12 The requirement for Local Plans to be prepared with the objective of contributing to the achievement of sustainable development is embodied in Paragraph 151 of the Framework and stems from the requirements set out under Section 39(2) of the Planning & Compulsory Purchase Act 2004. Local Plans must also be consistent with the principles and policies of the Framework.

2.13 Paragraph 152 of the Framework requires local planning authorities to seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development.

These three dimensions are defined in Paragraph 7 of the framework as economic, social and environmental. According to Paragraph 7 of the Framework these dimensions give rise to the need for the planning system to perform a number of roles:

- "an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and

at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.14 Paragraph 8 of the Framework states that the roles mentioned in Paragraph 7 should not be undertaken in isolation, because they are mutually dependant and should be sought jointly and simultaneously through the planning system.

2.15 The importance of Local Plans taking into account local circumstances is highlighted in Paragraph

10 of the Framework to ensure that they respond to the different opportunities for achieving sustainable development.

2.16 Paragraph 152 of the Framework goes on to deal with adverse impacts on any of the dimensions of sustainable development and sets out three tests:

- Firstly significant adverse impacts on any of the dimensions should be avoided, and where possible, alternative options which reduce or eliminate such impacts should be pursued.

- Where adverse impacts are unavoidable, measures to mitigate the impact should be considered.

- Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

2.17 Paragraph 154 of the Framework requires Local Plans to be aspirational but realistic and address the spatial implications of economic, social and environmental change.

2.18 The requirement for local planning authorities to set out strategic priorities for their areas in their Local Plans is established in Paragraph 156 of the Framework. Such policies are required to deliver:

- “the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape”.

2.19 The importance of using a robust and proportionate evidence base for Plan making is dealt with in Paragraphs 158 to 177 of the Framework. Paragraph 158 is of particular relevance to these submissions: “Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”.

2.20 A number of topics are discussed and for the purpose of this document we will focus on conservation (Paragraph 126), retail (Paragraph 23), business (Paragraphs 160), infrastructure (Paragraph 162) and environment (Paragraph 165).

CONSERVATION

2.21 Chapter 12 of the Framework focuses on conserving and enhancing the historic environment - Paragraph 126. The Framework is clear that Local Plan should set out a positive strategy for the conservation and enjoyment of the historic environment and in doing so they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. However, in developing this strategy, Paragraph 126 also states the following:

“...local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and

- opportunities to draw on the contribution made.”

2.22 Paragraph 129 further states:

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”

2.23 With regards the state of a heritage asset, Paragraph 130 is clear that:

“Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision.”

2.24 Paragraph 131 addresses what local planning authorities should take account of when determining planning applications:

“In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.”

2.25 And most pertinent to this specific Representation, Paragraph 137 states the following:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.”

RETAIL

2.26 Paragraph 23 confirms that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.

In drawing up Local Plans, local planning authorities should (amongst other things) recognise town centres as the heart of their communities and pursue policies to support their viability and vitality and define a network and hierarchy of centres that is resilient to anticipated future economic changes. The Framework is clear that it is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability.

BUSINESS

2.27 Paragraph 160 of the Framework outlines the importance of local planning authorities having a clear understanding (from a robust evidence base) of business needs within the economic markets operating in and across their area.

2.28 Paragraph 161 of the Framework establishes the importance of understanding business needs (both quantitative and qualitative) and ensuring that sufficient suitable land (both existing and future) is available to meet needs.

INFRASTRUCTURE

2.29 An objective of government policy is the delivery of growth. Central to this objective is ensuring that infrastructure has the capacity or can be enhanced to deliver growth. A number of factors are outlined in Paragraph 162 of the Framework which need to be considered at a local level including transport, water, foul drainage, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management.

ENVIRONMENT

2.30 Paragraphs 165 to 168 of the Framework deal with environmental matters and set out the requirement that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

SOUNDNESS

2.31 Paragraph 182 of the Framework deals with the examination of Local Plans. The Local Plan will be examined by an independent inspector whose role is to assess whether

the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. Local planning authorities are required to submit Plans for examination which they consider “sound” – namely that they are:

- “Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.

NATIONAL PLANNING PRACTICE GUIDANCE – LAUNCHED 6 MARCH 2014

2.32 On 28 August 2013 the government launched its draft National Planning Practice Guidance (NPPG). The draft NPPG was subject to consultation for 6 weeks and was launched on 6 March in its final form. The NPPG replaces some 230 planning guidance documents but will result in no amendments to the Framework.

CONSERVATION

2.33 The NPPG makes it clear that, in relation to plan making and the historic environment, local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment (Paragraph 004 Reference ID: 18a-004-20140306). It is made clear that a positive strategy:

“should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset.

The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. Local planning authorities should consider the relationship and impact of other policies on the delivery of the strategy for conservation.”

2.34 With regards the importance of non-designated heritage assets, the NPPG confirms at Paragraph:

039 Reference ID: 18a-039-20140306 that:

“What are non-designated heritage assets and how important are they?

Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some nondesignated heritage assets as ‘locally listed’.

A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process.”

RETAIL

2.35 With regards retail, the NPPG confirms that local planning authorities should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review:

“These market signals should be identified and analysed in terms of their impacts on town centres. This information should be used to inform policies that are responsive to changes in the market as well as the changing needs of business.

Paragraph: 004 Reference ID: 2b-004-20140306

2.36 The NPPG further confirms at Paragraph: 005 Reference ID: 2b-005-20140306 that the following indicators, and their changes over time, are relevant in assessing the health of town centres:

- “diversity of uses
- proportion of vacant street level property
- commercial yields on non-domestic property

- customers' views and behaviour
- retailer representation and intentions to change representation
- commercial rents
- pedestrian flows
- accessibility
- perception of safety and occurrence of crime
- state of town centre environmental quality

Not all successful town centre regeneration projects have been retail led or involved significant new development. Improvements to the public realm, transport (including parking) and accessibility as well as other measures promoted through partnership can also play important roles.

Any strategy should identify relevant sites, actions and timescales, and be articulated clearly in the Local Plan, where it can be considered by local people and investors. It should be regularly reviewed, assessing the changing role and function of different parts of the town centre over time."

3. POLICIES PROPOSED IN THE DRAFT LOCAL PLAN - HERITAGE

STRATEGIC POLICY ENV2: HERITAGE ASSETS

3.1 Draft Policy ENV2 confirms that the Council will support proposals which conserve or, where appropriate, enhance the historic environment of Rossendale. The Policy text further confirms that:

"Particular consideration will be given to ensure that the significance of those elements of the historic environment which contribute most to the Borough's distinctive identity and sense of place are not harmed. These include:

- The historic town centres of Bacup, Haslingden and Rawtenstall;"

3.2 The draft Policy further states that:

"Proposals within or affecting the setting of a conservation area will only be permitted where it preserves or enhances the character and appearance of the area including those elements which have been identified within the conservation area appraisal as making a positive contribution to the significance of that area."

3.3 The Explanation (i.e. supporting text) to the draft policy identifies the elements which make up Rossendale's historic built environment, including (amongst others), Conservation Areas. The text also comments that many buildings and structures in the Borough pre-date the industrial revolution, are constructed from locally quarried stone and contribute to Rossendale's local character and distinctiveness. The policy is clear that the Council considers these heritage assets as an irreplaceable resource 'and it is essential to protect and enhance them'.

3.4 There are nine Conservation Areas in the Borough, with Bacup Town Centre being one of them.

3.5 The supporting text also states:

"Accordingly, all new development affecting Rossendale's heritage assets or their setting needs to be based on a thorough understanding of the context, significance and local distinctiveness of the site and its surroundings and should be of a high quality in terms of its urban, landscape and architectural design and use of materials. Development needs to be in accordance with the Framework and relevant Historic England guidance; the Council's Conservation Area Appraisals and should be accompanied by a heritage statement."

3.6 The draft Explanation text notes that the Council are developing a local list of non-designated heritage assets which include buildings, monuments, sites, places, areas or landscape of significance. It is further stated that assets on the list have been carefully selected in accordance with guidance on Local Heritage Listing from Historic England and will be kept under review.

3.7 Attention is brought to the fact that this local list is not currently publicly available, nor does it appear to form part of the Evidence Base for the emerging Local Plan.

THE REGAL CINEMA

3.8 The first thing to note is that the subject site is located within the Bacup Town Conservation Area boundary, as illustrated below in the extract from the draft Policies Map:

Figure 3.1 Approximate location of subject site, the Former Regal Cinema, Burnley Road, Bacup (circled in red) located within the Existing Conservation Area.

3.9 For the avoidance of doubt, our position is that we take no issue with the subject site being located within the Conservation Area, indeed, we agree with the draft Local Plan that this part of Bacup is of historical interest. The site is located directly opposite the Bacup Cenotaph and adjacent to the Grade II Listed Building St Johns Church.

3.10 Appendix 2 contains a Technical Note prepared by Nexus in support of this Representation. The Note is clear that the building is not a designated heritage asset, nor is a locally listed building. Given its historic and architectural interest it would, nevertheless qualify as a non-designated heritage asset within the Conservation Area.

3.11 The Council's Evidence Base includes a report entitled Heritage Impact Assessment of Housing and Employment Sites (August 2018). For the avoidance of doubt, the subject site is not included within this document as the site is not proposed for any specific allocation in the Local Plan.

3.12 The only evidence that the subject site is of any historic interest to the Council, is that it is mentioned in the aforementioned Bacup Town Centre Conservation Area Character Appraisal and Management Proposals Plan (2011). The building is not listed, nor is it locally listed.

3.13 This will be discussed in further detail in Chapter 5 of this Representation.

4. POLICIES PROPOSED IN THE DRAFT LOCAL PLAN – RETAIL

STRATEGIC POLICY R1: RETAIL AND OTHER TOWN CENTRE USES

4.1 Figure 3.1 contained in the previous Chapter shows that the whole of the site is located on the edge of, but wholly within, the Bacup District Centre as defined on the draft Policies Map. The existing building sits at the end of a parade of retail units, some of which are occupied with others being vacant. The subject site is within very close proximity of the Primary Shopping Area (PSA) which is an area designated to the south east of the site, focussed around St James Square.

4.2 Chapter 3 of the Local Plan deals with retail. Strategic Policy R1 states that retail development will be focussed within the defined centres in the Borough with development proposals being expected to maintain or strengthen the retail offer and vitality and viability of town, district, local and neighbourhood parades. Large schemes are encouraged to be located in the District Centres of the Borough, those being Bacup and Haslingden.

4.3 The Explanation text to the policy confirms that the Council commissioned WYG Planning to undertake a Town Centre, Retail, Leisure and Tourism Study (town centre and retail study) (2017) to assess retail, leisure and tourism needs and capacity in Rossendale up to 2034. The study concluded that there is adequate provision of convenience goods within Rossendale, although it does make explicit reference to the fact that there may be an argument to improve Bacup's convenience goods offer over the longer-term to improve local consumer choice and competition.

In terms of comparison shopping, the study recommends that existing and planned future floorspace at the "out of centre" New Hall Hey Retail Park in Rawtenstall is capable of meeting projected needs and any future provision above and beyond this should be provided within Rawtenstall town centre in the first instance.

POLICY R3: DEVELOPMENT AND CHANGE OF USE IN DISTRICT AND LOCAL CENTRES

4.4 Policy R3: Development and Change of Use in District and Local Centres is drafted as follows:

"Policy R3: Development and Change of Use in District and Local Centres

The boundaries of the District and Local Centres are defined on the Policies Map. The following criteria apply for change of use and development in District and Local Centres:

- a) Planning permission will be granted for A1, A2, A3, and A4 uses which support the role and function of District and Local Centres.
- b) A5 uses (hot food takeaways) will be permitted where the proposal would not adversely impact, either individually or cumulatively, on the function, vitality and viability of the centre, subject to the provisions of other policies in this Plan.
- c) Planning permission will be not be granted for non-retail uses (including the loss of A1 use) unless it can be shown that there is no demand for retail or commercial use or the property was last occupied by a non-retail/non-commercial use. This will need to be demonstrated through an active 12 month marketing process showing that the property has been offered for sale or rent on the open market at a realistic price and that no reasonable offers have been refused.

The provision of flats on the upper floors of the building will be encouraged but this will not apply where the applicant can demonstrate that the whole building will be fully utilised for retail/commercial purposes."

4.5 The Explanation text confirms that minor changes have been made to the boundary changes of Rossendale's district and local centres and PSAs following recommendations

in the Council's town centre and retail study. It is further confirmed that the District Centre boundary in Bacup has been extended to encompass the Morrisons foodstore on Lee Street and an extension to the PSA to include the retail units on King Street, Rochdale Road and Irwell Street as well as the centre's new B&M Bargains store and public car park.

4.6 For the avoidance of doubt, our position is that we take no issue with the subject site being located within the District Centre boundary, on the contrary it is welcomed.

However, we request that the Local Plan is revised so that the site is allocated for retail use, for the reasons discussed in the following Chapters.

5. SOUNDNESS ASSESSMENT

INTRODUCTION

5.1 As mentioned in Chapter 2 above Paragraph 182 of the 2012 Framework deals with the examination of Local Plans. Local Planning Authorities are required to submit Plans for examination which they consider "sound" – namely that they are:

- "Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework".

5.2 In this section we consider the soundness of the Draft Local Plan Policies against the four key tests set out under Paragraph 182 of the 2012 Framework. It should be noted that for a Plan to be found sound it must comply with all of the four tests set out under Paragraph 182 of the Framework.

STRATEGIC POLICY ENV2: HERITAGE ASSETS AND STRATEGIC POLICY R1: RETAIL AND OTHER TOWN CENTRE USES AND POLICY R3: DEVELOPMENT AND CHANGE OF USE IN DISTRICT AND LOCAL CENTRES

POSITIVELY PREPARED

5.3 As demonstrated in this Representation the subject site is not suitable for retention or conversion. The building is in a deteriorating state and is not fit for commercial purposes, and certainly not for the current D2 (Assembly and Leisure) use. The site is empty and unused, and this has been the situation for more than four decades. It's inclusion within the Town Centre is a reflection of its location; it makes no contribution whatsoever to the retail offer. As it stands at the moment, there is no prospect of this position improving. It is our view that Policy ENV2 has not been positively prepared as it should make explicit reference to the demolition of the existing building to facilitate redevelopment of the site for uses appropriate in a Town Centre for the reasons set out in this detailed Representation. On this basis alone, the Council's Plan is unsound.

5.4 In this regard, the site should be allocated for retail, to positively reflect the aims of Strategic Policy R1 and Policy R3 as discussed in this Representation.

JUSTIFIED

5.5 Policies ENV2, R1 and fail to plan for the proper growth of Bacup as they do not acknowledge that there is no reasonable prospect of the existing building ever being brought back into a beneficial use, to the detriment of the Conservation Area and the economic objectives of the Plan.

5.6 There is no justification for the retention of a building which does not make a positive contribution to the Conservation Area or to the local economy.

EFFECTIVE

5.7 The preceding sections of this document have explained how the existing building is not suitable for retention or conversion for any commercial use or alternative use; the Local Plan is therefore not effective.

6. PROPOSED REVISIONS TO THE LOCAL PLAN - RETAIL

ALLOCATION

6.1 This Representation sets out how the Local Plan should be revised to formally enable the demolition of the former Regal Cinema and the redevelopment of the site to facilitate appropriate town centre uses, which would bring about a number of benefits as discussed below.

DEMOLITION IN THE CONSERVATION AREA

BENEFIT 1 – POSITIVE IMPACT ON THE CONSERVATION AREA

6.2 Firstly, the building sits within the Bacup Town Centre Conservation Area. According to the Council's Conservation Area Character Appraisal and Management Proposals Plan (2011), the building is characterised as the following:

- A 'positive' unlisted building of medium quality – Map 2: Building Designations.
- On the edge of Character Area 7: Burnley Road – Map 4: Character Areas.
- An Historic building in largely commercial use – Map 6: Building Form / Uses.
- On a Primary Road and a commercial frontage, mainly where improvements would be welcome – Map 7: Urban Structure.

6.3 The Appraisal acknowledges that the building is not listed, however it does identify the building on a Townscape Appraisal Map as being a positive building of townscape merit. The Appraisal states:

"Buildings identified as being positive will vary, but commonly they will be good examples of relatively unaltered historic buildings where their style, detailing and building materials provides the streetscape with interest and variety. Most importantly, they make a positive contribution to the special interest of the Conservation Area."

6.4 And:

"The publication of PPS5 in the spring of 2010, which suggests that the significance of all 'heritage assets' needs to be recorded and assessed, has meant that further analysis of positive buildings is considered necessary, incorporating what in the past might have been considered to be 'neutral' or even 'negative' buildings. For Bacup, these buildings have therefore been broken down into the following categories:

- Positive unlisted buildings of high quality
- Positive buildings of medium quality

Modern positive buildings which fit into the townscape, or historic buildings which have been altered

- Modern buildings where sensitive redevelopment (in time) would be welcome

The identification of these 'positive' buildings follows advice provided within English Heritage's Guidance on conservation area appraisals, which provides a helpful list of criteria in Appendix 2. The guidance advises that a general presumption exists in favour of retaining those buildings which make a 'positive' contribution to the character or appearance of a conservation area.

Proposals to demolish such buildings will therefore be assessed against the same broad criteria as proposals to demolish listed buildings. This implies therefore that all buildings marked blue and orange on the Townscape Appraisal Map will be retained in the future unless a special case can be made for demolition.

The 'positive' buildings in the Conservation Area include religious, municipal, commercial and residential properties. A selection is provided below:

6.5 The subject building forms part of this list, as listed on Page 39 of the Appraisal.

6.6 Section 5.5 of the Appraisal refers to shops and shopfronts, noting that despite the provision of many smaller, family-run shops in Bacup, there are very few complete historic shopfronts remaining within the town. The Appraisal determines that nos 26-36 even Burnley Road (only No. 32 retains all of its original features – the rest are a little altered) are amongst the best examples; these units are located further north of the former cinema building.

6.7 The site is located within Character Area 7: Burnley Road, as identified in Section 6.8 of the Appraisal and replicated overleaf:

Figure 6.1 Extract from Bacup Town Centre Conservation Area Appraisal and Management Proposal Plan (2011).

6.8 It should be noted that the subject building is identified as one of the six key negative features in this Character Area; it comprises the list shown in Figure 6.1 above.

6.9 Taking all of the above together, the building has not been identified on any of the maps or within the main body of the Appraisal as one of the more important buildings in the Conservation Area.

For example, on Map 2 it has not been designated as a 'positive' building of high quality, nor is it designated as a 'building where sensitive redevelopment would be welcome'. And on Map 6, it is not considered to be an 'important historic building in non-residential use, nor an 'important historic building at risk from neglect or vacancy'. The key conclusions from this is that the building is simply an historic, medium quality building which is vacant and located on a primary road along a commercial frontage.

6.10 The Technical Note contained in Appendix 2 to this Statement also addresses this point.

6.11 The demolition of the empty, unremarkable and unlisted building would not harm the Conservation Area, indeed we're of the view that the demolition of the building and the redevelopment of the site would bring about positive benefits to the Conservation Area.

Figure 6.2 Current photograph looking northwards up Burnley Road showing the former Regal Cinema on the left with St Johns church in the background on the left-hand side of the photograph.

Figure 6.3 Historic photograph looking northwards up Burnley Road with St Johns church in the background on the left-hand side of the photograph.

6.12 If the subject building were to be demolished it would also provide a unique opportunity to re-open up a long-lost view of the adjacent Grade II listed church, St Johns. As the images above very clearly show, at one time the site of the Regal Cinema was occupied by a run of buildings much more in keeping with the local vernacular with what appear to be retail uses at the ground floor.

The date of the photograph is unknown, but it shows that prior to the Regal Cinema building being built (in circa 1931), there once was an attractive run of two storey buildings which continued along this part of Burnley Road.

6.13 The demolition of the building would remove a structure which makes no positive contribution to the streetscene but which harms the view of the primary approach to Bacup town centre from the northern end of Burnley Road. It is the last large building one sees on the eastern side as one approaches the roundabout at St James Square and the lasting impression is that the building does not befit the surrounding character of this commercial area and the historical character that Bacup town is known for. The Council has made great efforts to improve the appearance of the roundabout and surrounding commercial buildings, but the vacant Regal Cinema is at odds with these upgrades.

6.14 The Technical Note (Appendix 2) also noted that the mass of the Regal Cinema is somewhat at odds with the surrounding structures and this, combined with its impoverished appearance means that it does compete insensitively with the Church of St. John the Evangelist and acts as a visual detractor within the Conservation Area. The note further states that:

“There is no statutory or policy provision (national or local) which prohibits the demolition of the existing building and redevelopment of the site.”

6.15 A planning application was submitted in 2009 for part demolition and making-good of the gable to no. 14 Burnley Road (Application Reference 2009/222) however this was refused due to lack of information submitted at that time, as set out in the Officers Report contained in Appendix 3.

There is nothing to suggest that the principle of demolition was considered unacceptable, it was simply the case that, at that time, the Council was not convinced there was enough information to support the application for the removal of the roof/upper part of walls.

6.16 If the subject building were to be demolished, an opportunity would present itself to open up the view once more to the church and rebuild the site with something which is wholly more appropriate and in character with the surrounding buildings. It would not only improve the viewpoints surrounding the church, but would improve the general vista of Burnley Road and the Cenotaph which is positioned opposite.

6.17 Finally, the Technical Note in Appendix 2 confirms:

“Under both local and national policy there is no provision which prohibits the demolition of the cinema building and therefore there is no reason not to consider the site for allocation or to deny the submission of an application to redevelop it.”

BENEFIT 2 – ECONOMIC BENEFITS TO LOCAL ECONOMY

6.18 A second benefit of demolition, is that the site would be redeveloped and brought back into use which would result in benefits to the visual appearance of the Conservation Area, and economic benefits to the Bacup and the wider Borough. There is no possibility that the building can be retained and the site brought back into viable use.

6.19 The building has been vacant and unused for more than 40 years. B&E Boys Ltd has had the site within their ownership since April 2007 and within that time the site has been subject to a land assembly programme securing surrounding properties to enable the site to be considered holistically. In addition, the owners have continually sought end users since taking ownership.

6.20 Unfortunately, the building is in a significant state of disrepair and has been deteriorating since long before the current owners purchased the site. Appendix 4 contains a structural conditions report completed in January 2018 by Michael Pooler Associates Ltd. The report updates a previous survey undertaken in 2009. The report confirms that the previous deterioration identified in 2009 has increased and further confirms that none of the original architectural features are present or capable of preservation and with

the exception of perimeter walls, there are no elements of construction which could economically be saved. The report describes the state of the building as 'severe state of dilapidation'. On this basis, the building is clearly not suitable for retention, and moreover is not capable of conversion. There is compelling evidence to support the demolition of the building and the owners are minded to seek planning permission to that effect.

6.21 In addition to that carried out by the owners the site has been the subject of a targeted marketing campaign by Trevor Dawson. Their update is included at Appendix 5. In short, the abnormal costs associated with re-use prohibits the re-use of the building.

6.22 We would respectfully suggest that the Council acknowledges that demolition of the building would be beneficial to the aims and objectives of the Local Plan. To that end, we seek an amendment to draft Policy ENV2 to make specific reference that the Regal Cinema should be demolished to bring about positive benefits to Bacup Town Centre Conservation Area.

BENEFIT 3 – CONTRIBUTIONS TO THE AIMS OF THE TOWNSCAPE INITIATIVE

6.23 The subject site is located within an area identified by the Council as part of the Townscape Heritage Initiative (THI). The THI is a grant scheme funded by the Heritage Lottery Fund (HLF) to refurbish buildings in historic town centres, and includes property improvements, public realm enhancement, skills training and community engagement events. The THI area is shown in Figure 6.4 below:

Figure 6.4 Approximate location of subject site (circled in red) located within the THI boundary and Bacup Town Conservation Area.

6.24 The improvements to the Conservation Area brought about by the demolition of the building would sit squarely within the aims of the THI to improve the townscape of Bacup town. As the site is located within the boundaries of an identified area where improvements to the historic townscape are encouraged and there is funding in place to assist landowners, it is considered there is overwhelming evidence to support any scheme which would result in positive impacts on the Conservation Area. As submitted above, the demolition of the Regal Cinema would deliver this.

PROPOSED RETAIL ALLOCATION

6.25 The site is within the Bacup District Centre where retail uses are encouraged and directed to. The Retail Study (refer to Paragraph 4.3 above) notes that there is some capacity in Bacup to continue to serve the future needs of residents for both convenience and comparison goods.

6.26 The site is located at the end of a run of buildings where retail uses can be found at the ground floor. The subject building was last used as a bingo hall, (more than 40 years ago) which indicates that the last use of the site was D2: Assembly and Leisure (according to the Land Use Class Order). All of the Council's evidence base notes that the site is in a commercial use, and Map 7 of the Conservation Area Appraisal includes the site within a commercial frontage where improvements would be welcome. The building has sat vacant and unused for its current use for more than four decades and as the marketing campaign irrefutably indicates, there has been no interest for the building to be reused for the current use, or indeed any other use.

6.27 Therefore, in conjunction with the proposal to demolish the building, on behalf of the landowner, the Representation also requests that the Local Plan be altered so that the subject site be allocated for a retail use. As set out in Chapter 4 above, the whole of the site is located on the edge of, but wholly within, the Bacup District Centre as defined on the draft Policies Map. The site adjoins the end of a parade of retail units, some of which are occupied with others being vacant. In addition, the site is within very close proximity of the Primary Shopping Area (PSA) which is an area designated to the south east of the site, focussed around St James Square.

6.28 With the above in mind, a retail allocation for the site known as the Regal Cinema would be wholly appropriate and would comply with the Policies Plan which includes the site within the designated District Centre; the site at the Former Regal Cinema should be allocated for retail in the emerging Local Plan. It is noted that the Local Plan, as currently drafted, does not contain any proposed retail allocations however, the absence of such policy does not preclude from one being included in the document. As such, the following wording is suggested for this unique retail allocation:

The former Regal Cinema, Burnley Road, Bacup

The site of the former Regal Cinema on Burnley Road, Bacup is allocated for retail development. The demolition of the building to facilitate redevelopment will be considered favourably by the Council provided that any planning application is accompanied by a report detailing the structural condition of the building, and a Heritage Impact Assessment as the site is within the Bacup Town Conservation Area. Proposals for retail redevelopment must include details on how the scheme will provide adequate car parking facilities

and suitable boundary treatments.

6.29 The area to which the policy would relate is edged in red in the Location Plan contained in Appendix 1.

6.30 To conclude therefore, a stand-alone Policy should be included in the Local Plan which deals specifically with the proposed allocation of the site for retail use and enables the demolition of the building. At present, Policy R3 (Development and Change of Use in District and Local Centres) does not go far enough to support and secure the retail use of the site. Whilst it is noted that criterion a) states that Planning permission will be granted for A1, A2, A3, and A4 uses which support the role and function of District and Local Centres, it has been shown in this Representation that there is an overriding need to specifically address the future economic use of the subject site.

6.31 A specifically defined retail allocation would secure the future use of the site, to the benefit of Bacup District Centre, and in conjunction with the proposed demolition of the existing building, would also result in a positive benefit to the character and appearance of Bacup Town Centre Conservation Area.

7. CONCLUSIONS

7.1 The starting point for consideration of the Council's Local Plan is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

7.2 The Framework is clear at Paragraph 22 that planning policies should avoid the long-term protection of sites allocated for use where there is no reasonable prospect of a site being used for that purpose. Paragraph 160 outlines the importance of local planning authorities having a clear understanding of business needs within the economic markets operating in and across their area.

7.3 It has been highlighted in this Representation that the Regal Cinema building has fallen into disrepair over time and since taking ownership, the landowner has made attempts to address the physical state of the building. The building has been vacant for more than four decades and despite a longstanding and credible marketing exercise, the building has not been attractive to any commercial operator. In short, the building is not useable in its current state, and it would not be suitable or viable to make any repairs to the building; the building should be demolished.

7.4 The emerging Local Plan should be revised to make specific reference to the building being demolished and the resultant land allocated for retail in the Local Plan. The benefits of this would be two-fold and have been described in this Statement.

7.5 Firstly, the removal of a vacant, unused and deteriorated building would result in many positive benefits to the Bacup Town Conservation Area; these are discussed in detail in Chapter 6.

7.6 Secondly, the allocation of the site for retail would not only accord with the designation of the site within the Bacup District Centre but would wholly accord with the aims of Strategic Policy R1 of the emerging Local Plan; these are discussed in Chapters 5 and 6.

To conclude therefore, a stand-alone Policy should be included in the Local Plan which deals specifically with the proposed allocation of the site for retail use and enables the demolition of the building.

Appendix 1 Location Plan

Appendix 2 Heritage Technical Note - Nexus Heritage

Appendix 3 Officer Report for Planning Application 2009/0222

Appendix 4 Structural Conditions Report - Michael Pooler Associates Ltd

Appendix 5 T Dawson Letter

Please see appendix

PROPOSED MODIFICATION

5.8 To be consistent with national policy, the Council is respectfully requested to revise Strategic Policy ENV2 to make specific reference to the redevelopment of the former Regal Cinema site.

The NPPG makes it clear that local planning authorities should positively prepare strategies for the conservation and enjoyment of the historic environment and this can include

making specific reference to buildings.

5.9 Moreover, the site should be allocated for retail use. Allocation of the site for retail use would comply with the designation of the site within Bacup Town Centre and with the aims of Strategic Policy R1. A unique policy which deals with the specific allocation of the site should be included in the Local Plan. The wording of such a proposed policy is set out in the following Chapter 6.

6. PROPOSED REVISIONS TO THE LOCAL PLAN - RETAIL ALLOCATION

6.1 This Representation sets out how the Local Plan should be revised to formally enable the demolition of the former Regal Cinema and the redevelopment of the site to facilitate appropriate town centre uses, which would bring about a number of benefits as discussed below.

DEMOLITION IN THE CONSERVATION AREA

BENEFIT 1 – POSITIVE IMPACT ON THE CONSERVATION AREA

6.2 Firstly, the building sits within the Bacup Town Centre Conservation Area. According to the Council's Conservation Area Character Appraisal and Management Proposals Plan (2011), the building is characterised as the following:

- A 'positive' unlisted building of medium quality – Map 2: Building Designations.
- On the edge of Character Area 7: Burnley Road – Map 4: Character Areas.
- An Historic building in largely commercial use – Map 6: Building Form / Uses.
- On a Primary Road and a commercial frontage, mainly where improvements would be welcome – Map 7: Urban Structure.

6.3 The Appraisal acknowledges that the building is not listed, however it does identify the building on a Townscape Appraisal Map as being a positive building of townscape merit. The Appraisal states:

“Buildings identified as being positive will vary, but commonly they will be good examples of relatively unaltered historic buildings where their style, detailing and building materials provides the streetscape with interest and variety. Most importantly, they make a positive contribution to the special interest of the Conservation Area.”

6.4 And:

“The publication of PPS5 in the spring of 2010, which suggests that the significance of all 'heritage assets' needs to be recorded and assessed, has meant that further analysis of positive buildings is considered necessary, incorporating what in the past might have been considered to be 'neutral' or even 'negative' buildings. For Bacup, these buildings have therefore been broken down into the following categories:

- Positive unlisted buildings of high quality
- Positive buildings of medium quality

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 2

Statement of Consultation

Comments on policy	Statement of Consultation	Statement of Consultation
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Reference **5119 Mr Richard Lester**

Number of supporters:

Commenting on Statement of Consultation

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

A6 Statement of Consultation is non-compliant

A6.1 The Statement of Consultation, which is required by section 20(3) of the Planning and Compulsory Purchase Act 2004 and regulation 22(1)(c) of the Town and Country Planning (England) Regulations 2012, states at paragraph 2.5:

The Local Development Scheme sets out the timetable for producing the Local Plan. The latest version was agreed by Council on 14th December 2016, noting that submission to the Secretary of State is expected in January 2019.

The question whether the LDS was approved on 14 December 2016 is considered in section A1 above. There is no Minute to that effect. Therefore paragraph 2.5 of the Statement of Consultation is wrong, thereby vitiating the document.

A6.2 Under the heading 5. How Key Issues have been taken into account to prepare the Publication version of the Local Plan, Paragraph 5.3 of the Statement of Consultation states:

Discussions have taken place with LCC Education to try to address the concern with schools capacity and as a result some land has been identified for a new/enlarged school. The LP does not identify this land. Indeed, it would be hard for it do so, as a new school would probably require more land than an enlargement. Moreover, the land is not identified in any other published document. It is therefore wrong to say that preparation of the LP took this issue into account. All that the LP says on this point is in the Explanation to Policy HS3: Edenfield Primary School is operating close to capacity and there is no capacity at Stubbins Primary School. The preferred course of action of the Education Authority would be to expand Edenfield School onto adjacent land provided that any access issues can be overcome. Should this not prove feasible land would need to be allocated within the proposed residential area for this purpose.

In other words, contrary to what the Statement of Consultation says, land has not been identified for a new school. Such incorrect and misleading information vitiates the Statement.

A6.3 Paragraph 5.3 of the Statement of Consultation continues:

A detailed Topic Paper has been produced setting out why “Exceptional circumstances” are considered to exist to justify Green Belt release.

Producing a Topic Paper, even one that fails in its declared purpose of identifying exceptional circumstances, nearly a year after the key issue of the release of Green Belt land west of Market Street, Edenfield was identified in 2017 and after the LP was presented to the Full Council in July 2018 only serves to demonstrate that this key issue was dismissed, rather than taken into account, in preparing the Publication Version. The Statement of Consultation is thereby misleading.

A6.4 Regulation 22(1)(c) requires a Statement of Consultation to set out, amongst other matters:

- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
- (ii) how those bodies and persons were invited to make representations under regulation 18

The Council’s Statement is non-compliant in these respects. It notes these requirements at paragraph 1.2 and then ignores them. Paragraph 3 of the Statement reads:

3. Consultation on the Rossendale Local Plan 2019-2034

3.1 The Council aimed to engage with a number of stakeholders on the emerging Local Plan through a developer forum, an information event on the Evidence Base documents, a formal Local Plan consultation and a series of roadshows.

3.2 Developers and registered providers were invited to a forum that was held on 21st June to discuss the emerging Local Plan and its Evidence Base documents.

3.3 An information event on the Evidence Base documents followed on 4th July 2017.

During this event, members of the public had the opportunity to view the documents and ask questions to members of the Forward Planning tea (sic)

3.4 The Council then consulted on the draft Local Plan (Regulation 18) version between 24th July 2017 and 9th October 2017, a period of 11 weeks in total. A press notice was

advertised within the Rossendale Free Press edition of Friday 21st July 2017 to inform residents of the consultation. Also, over 1,700 emails and 560 letters were sent to people who expressed an interest to be kept informed about the Local Plan process.

3.5 During the consultation period, seven roadshow events [the times and places of which are set out in a table] took place at various locations within the Borough during where (sic) people were able to view the proposed allocations and the documents themselves. The Evidence Base was also available to view, and members of the public had the opportunity to ask questions. They were also helped in making comments using the online questionnaire. . . .

Who were these stakeholders? Who were these developers and registered providers? Were they actually invited to make representations under Regulation 18, and, if so, how were they invited? Was any other person so invited? Who were the bodies and persons identified by the Council for the purpose of Regulation 18? To whom were the 1,700+ emails and 560 letters sent? Were these invitations to make representations? The Statement should specify all of these matters but fails to do so. It is therefore defective.

A6.5 These defects in the Statement of Consultation cannot be cured by submitting a corrected version to the Secretary of State. The public is entitled to see an accurate and compliant Statement throughout the Regulation 19 consultation period. It is acceptable to update the Statement at the time of submission, but it is too late to re-write it then. In the absence of a compliant Statement, the Regulation 19 consultation period has passed without all the relevant documents being available. The consultation must therefore be re-run.

Do you wish to participate to the Examination In Public?	Yes	Reasons
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Number of comments in this section	1	
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Statement of Representations

Comments on policy Statement of Representation

Reference **5119 Mr Richard Lester** Number of supporters:

Commenting on Statement of Representation

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

A5 Error in Statement of the Representations Procedure
 A5.1 To the prejudice of potential objectors the Statement of the Representations Procedure incorrectly states that the documents may be inspected at Rawtenstall Library until 1900 hrs on Mondays. In fact, on Mondays the Library closes at 1700 hrs - <https://www.lancashire.gov.uk/libraries-and-archives/libraries/find-a-library/rawtenstalllibrary/>
 This error is inexcusable and totally avoidable. The consultation process should be re-run.

Do you wish to participate to the Examination In Public? **Yes** Reasons

Reference **5148** **Edenfield Community Neighbourhood Forum** Number of supporters: **1213**

Commenting on Statement of Representation

Is the Local Plan legally compliant? **No** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Statement of Representations
 Not Legally Compliant

2. We consider that the Statement of Representations is not compliant with the Regulations. The Regulations state that the Statement of Representations must specify the subject matter of the Local Plan. Although RBC provides a specification of what the Local Plan covers it does not mention Green Belt and is misleading. We consider that the Statement of Representations is misleading and incomplete given the significant actions of RBC in claiming it has exceptional circumstances and proposing strategic Green Belt release in the Local Plan.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section **2**

Sustainability Appraisal

Comments on policy	Sustainability Appraisal	Sustainability Appraisal
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Reference	5119 Mr	Richard	Lester		Number of supporters:
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Commenting on Sustainability Appraisal

Is the Local Plan legally compliant? No	Is the Local Plan sound? Did not answer	Does the Local Plan complies with the duty to co-operate? Did not answer
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A7. Sustainability Appraisal is misleading

A7.1 The Sustainability Appraisal gives reference numbers for the site assessments, but these are not the same as the reference numbers for those sites in the Local Plan. For example, land at Edenfield west of Market Street has reference H72 in the Local Plan but H74 in the Sustainability Appraisal. In the Local Plan H74 refers to land at Grane Village.

A7.2 This is highly misleading and confusing for any person examining the Sustainability Appraisal and prejudices the making of representations. The Sustainability Appraisal is thereby unfit for purpose and should be withdrawn. It invalidates the consultation that has taken place. A fresh Sustainability Appraisal, correctly cross-referenced to the Local Plan, must be prepared, and, when it is available, the consultation must be re-run.

Do you wish to participate to the Examination In Public? Yes	Reasons
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Reference **5148****Edenfield Community Neighbourhood Forum**

Number of supporters:

1213

Commenting on

Is the Local Plan legally compliant? **No**Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

Sustainability Appraisal (July 2018)

Not Legally Compliant

Unsound: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy.

82. Section 2.3 of the Sustainability Appraisal (SA) explains that “four Strategy approaches to delivering development requirements and what this will mean in terms of the location and quanta of development”. It states that the four alternatives for quanta of development were assessed for their likely impacts on sustainability. The four alternatives are:

- 3,000 dwellings and 10ha of employment land;
- 7,000 dwellings and 24 ha of employment land;
- 2,000 dwellings and 6ha of employment land; and
- 5,000 dwellings and 9 ha of employment land.

83. The SA provides no explanation as to why these four strategy approaches were selected. It simply provides a brief explanation that the SHMA identified a housing need of between 265- 335 dpa and the Regulation 19 housing figure of 212 dwellings per annum which it states is 3,180 over the plan period. It provides no explanation as to why the employment land figures were selected for these strategy approaches or how the housing and employment land quantum relate to each other.

84. The SA then jumps to a section explaining that “The Council has considered various spatial strategies for delivering development proposed in the Local Plan”²⁷. Table 2.2 of the SA sets out four ‘spatial options’. However the description of Table 2.2 is “Spatial strategy reasonable alternatives considered by the Council and assessed in Appendix D”. By this point of reading the SA we have presented with such inconsistent terminology that it is unclear as to what we consider are:

- ‘Strategy Approaches’; or
- ‘Spatial Strategies’; or
- ‘Spatial Strategy Reasonable Alternatives’

85. Appendix D of the SA is called ‘Strategic Spatial Options’ so the reader is presented with the fourth term for what may or may not be the same approaches, strategies and reasonable alternatives listed above. Appendix D attempts to explain how the housing and employment figures were tested in the SA stating that:

“The Council’s Strategic Housing Market Area Assessment (SHMA) (2016) examined economic and demographic evidence to assess the housing needs in the borough for the Plan period. Since then, the Government implemented a new standard methodology for calculating housing figures. Using this approach, the annual housing need for Rossendale is 212dpa. Over the Plan period (2019 – 2034) this would equate to a total of 3,180 dwellings. The Council therefore consider there to be a need for a total of 3,180 dwellings over the Plan period (in addition to 27ha of employment land).”

86. It states that the 3,180 dwellings in addition to the 27ha of employment land. It is unclear as to where the 27ha of employment land has come from.

87. Table D.1 of the Appendix D is entitled: ‘Spatial Options and Quanta reasonable alternatives assessed in this report’, which appears to be the fifth term for what appear to be the same other ‘options’ already mentioned above. Table D.1 is included below and summarises the Spatial Options tested. It is completely unclear as to why the quanta of development or how the distribution of development was prepared as they seem to be random. This raises considerable concern as to how much of the SA can be relied on.

What is most worrying is that the SA supposedly informed the preparation of the Local Plan. For instance:

- Why do none of the options test the selected housing target for the Local Plan?
- Why do none of the options seek to meet the 27ha of employment land stated above which is the target in the Local Plan?
- Why do none of the options test the Local Plan housing target and employment target as an option?

- Why do three of the four options test an employment land figure which is many times smaller than the employment land target of the Local Plan?
- Why are 7,000 dwellings tested as a reasonable alternative? This is more than double the Local Plan Target.
- Why are 2,000 dwellings tested which is considerably lower than the objectively assessed need figure?

88. We have a number of questions about the Spatial Options which highlight how flawed the SA is. There is only one option which includes Edenfield (Option B).

89. Spatial Option A:

Distribution

- This option does not include Edenfield however shows that it can nearly meet the Local Plan housing target.
- What does “58ha on urban boundaries” mean and which urban boundaries is it referring to?
- What is the breakdown between housing and employment land as it simply says 23ha Rawtenstall, 23ha Bacup, 9.5ha Whitworth?
- It states 5ha Green Belt sites – where are these sites and what type of development was tested?
- <20% Brownfield sites – where is this brownfield land it is referring to?

90. Spatial Option B:

Distribution

- Why is significant development at Edenfield part of this Option? What is considered significant?
- 25ha of greenfield in villages – what villages and why was 25ha selected?
- Where are the 11ha of Green Belt which were tested?
- <10% Brownfield sites – where is this brownfield land it is referring to?

Figure 11 Table D.1 Spatial Options and Quanta reasonable alternatives assessed in this report (SA Appendix D)

91. The land west of Market Street has been wrongly identified as allocation H74 (rather than H72).

92. The SA fails to refer to any specific heritage assets and their setting. It assumes that a future masterplan will address and mitigate any heritage assets however this is not an assumption that can be relied upon. There is no reference to the Grade II* listed Edenfield Parish Church in the SA or Elton Banks Grade II listed building in Edenfield. Nor does the SA mention the Stubbins Conservation Area or consider the impact on its setting which is near to the proposed strategic development in Edenfield.

Do you wish to participate to the Examination In Public? Did not answer Reasons

Reference **5160****The Peel Group**

Number of supporters:

Commenting on

Sustainability Appraisal and consideration of reasonable alternatives

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **No**Does the Local Plan complies with the duty to co-operate? **Did not answer**

7. The Sustainability Appraisal and consideration of reasonable alternatives

7.1 The PSLP Sustainability Appraisal (SA) was prepared by Lepus and published in August 2018. Section 2 of the Report sets out the SA process to date, and includes an assessment of 'reasonable alternatives'. Section 2.3 specifically focuses on the amount of housing and employment development.

7.2 The document acknowledges the needs identified in the 2016 SHMA as well highlighting the standard methodology for calculating housing need in the revised NPPF. The following four alternative strategy approaches were considered for their impact on sustainability:

- Option A - 3,000 dwellings and 10ha of employment land;
- Option B - 7,000 dwellings and 24ha of employment land;
- Option C - 2,000 dwellings and 6ha of employment land; and
- Option D - 5,000 dwellings and 9ha of employment land.

7.3 The SA states that "Overall, Option D was considered to be the best performing option. It would allow the Council to deliver a scale of development which satisfies the local needs whilst also providing scope for mitigating the potentially adverse impacts of development."

7.4 At the end of Section 2 the SA provides further detail on the Preferred Approach and states:

"The Council are seeking to satisfy local development needs by delivering 27ha of employment land and 3,180 dwellings at 212 dwellings per annum. The Council's preferred spatial approach is Spatial Option D (see Appendix D), which seeks to meet the Borough's development requirements whilst protecting the natural and historic environment. Option D seeks to promote balanced housing growth by encouraging development in areas of the Borough that would benefit from regeneration as well as recognising high levels of market demand in the west of the Borough. This Option seeks to maximise use of brownfield land and higher densities on sites in accessible locations."

7.5 The commentary above appears to avoid mention of the fact that the PSLP fails to meet the amount of development which is considered as part of Option D (and indicated to represent the most sustainable through the SA process undertaken). The housing requirement identified in Policy HS1 is nearly 2,000 dwellings less than the figure included within Option D.

7.6 It is evident that the SA has therefore been retro-fitted to meet the housing figure which the standard methodology has produced. Consequently the SA has failed to assess the sustainability of not meeting the needs identified in the SHMA and the impact this will have out-commuting and affordability. Option D is not a true reflection of the strategy adopted in the PSLP. The Council has failed to explain the justification for selecting a growth option which deviates from the findings of the SA.

7.7 Furthermore, the appraisal of spatial options within the SA is deficient insofar as these are not considered in isolation. Instead each is tied to a different housing requirement figure. For example, the option of a more equal distribution between Bacup and Rawtenstall (Option A) is considered but only in the context of a housing requirement figure of 3,000 units. Conversely, an option whereby Bacup accommodates more residential development than Rawtenstall is also considered (Option D) but only in the context of an overall housing requirement figure of 5,000 units. This means that the true sustainability of each spatial distribution is not properly understood as there are other variables (namely a variable housing requirement) influencing judgements on the relative sustainability of each.

7.8 In this regard, it is noted that Spatial Option D (which includes Bacup accommodating approximately 40% more residential development than Rawtenstall) is deemed to represent the most sustainable option, principally because of the positive score in respect of the 'housing' criteria of the assessment framework (due to it including 5,000 houses rather than Option A for example which includes only 3,000 as per the PSLP). Had the housing requirement aspect of Spatial Option D been combined with the spatial distribution aspect of Option A (which sees Bacup and Rawtenstall accommodating a more equal level of development), this may have scored more favourably than Option D as presented.

7.9 As it has transpired, whilst Option D is identified as the most sustainable through the (defective) SA process, the housing requirement component of Option A has effectively been taken forward into the DLP, with the spatial distribution aspect of Option D. This combination of Options A and D has not been tested through the SA and has not been proven to represent a sustainable approach relative to the alternative options.

7.10 As a result of the above, it is evident that a deficient SA process has been pursued which does not satisfy the requirements of the Strategic Environmental Assessment (SEA) Directive. Principally the SA process has failed to demonstrate that the PSLP represents the most sustainable approach when considered against reasonable alternatives. It cannot be relied upon in its current form and does not meet the relevant legal and procedural requirements therefore. This deficiency also means that the PSLP’s evidence base is also deficient. The PSLP is unsound as a result in not being justified.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Reference **5163 Ms Emily Hrycan Historic England** Number of supporters:
 Commenting on Sustainability Appraisal

Is the Local Plan legally compliant? **Did not answer** Is the Local Plan sound? **Did not answer** Does the Local Plan complies with the duty to co-operate? **Did not answer**

Dear Sir
 Sustainability Appraisal for the Publication version of the Local Plan for Rossendale (Regulation 19)
 Thank you for consulting Historic England about the above document.
 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. Historic England has produced a document, which you might find helpful in providing guidance on the effective assessment of the historic environment in Strategic Environmental Assessments. This can be found at <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> .
 Historic England has provided a separate response to the Local Plan (see letter reference: PL00135762). In view of our response provided in this letter, we do not have any comments to make on the sustainability appraisal.
 Historic England strongly advises that the conservation staff at the Council are closely involved throughout the preparation of the SA of the plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.
 Finally, we should like to stress that this opinion is based on the information provided by you with your email dated 23 August 2018 and that available online. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.
 If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Do you wish to participate to the Examination In Public? **Did not answer** Reasons

Number of comments in this section 4

Total number of comments 826