

ROSSENDALE DRAFT LOCAL PLAN
EMPLOYMENT LAND TOPIC PAPER



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Contents

.....	1
1 Introduction.....	3
2 Background.....	4
2.1 National Context	4
2.2 Regional / Local Context.....	5
3 Evidence Base	6
3.1 Employment Land Review 2017.....	6
3.2 Highway Capacity Study	14
3.3 Rossendale Employment Sites Study	14
3.4 Strategic Housing Land Availability Assessment (SHLAA)	14
3.5 Authority Monitoring Report (AMR)	15
3.6 Green Belt Review	16
3.7 Strategic Flood Risk Assessment (SFRA).....	17
3.8 Sustainability Appraisal (SA).....	17
4 Choice of Employment Sites in Rossendale Local Plan	17
5 Comments to draft Local Plan (Regulation 18) and changes made.....	19
6 Conclusion.....	20

1 Introduction

1.1 This Topic Paper is one of a number that have been produced to discuss and explain how the overall Strategy was developed for the emerging Rossendale Local Plan, with this paper focusing on employment land. It provides a brief summary of the evidence base related to employment land and an explanation of how this informed the preparation of employment policies and site allocations within the Plan.

1.2 In this context, employment land relates to development or uses falling within the B1, B2 and B8 planning use classes¹. Unless otherwise indicated, the version of the Local Plan referred to in this Topic Paper is that published as part of the Regulation 19 Pre-submission Publication stage (consulted on between August and October 2018) and which will be subject to the Local Plan Examination. This may simply be referred to as the Local Plan or emerging Local Plan.

1.3 The National Planning Policy Framework (NPPF) 2018² states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt and should recognise and address the specific locational requirements of different economic sectors. This will involve proactive planning to meet the development needs in the Borough, setting out how much land is required and identify allocations to satisfy this demand. The Local Plan must ensure that there is sufficient local supply in Rossendale for businesses to expand and grow and to attract new economic activity to the area.

Rossendale in Context

1.4 Rossendale is a predominantly rural authority in Lancashire, with the population being concentrated in the settlements along the valley floors. The Borough is bounded by the authorities of Bury (to the south-west), Rochdale (to the south-east), Calderdale (to the east), Burnley (to the north), Blackburn-with-Darwen (to the west) and Hyndburn (to the north-west).

1.5 Rossendale occupies a strategic location within the region, astride the M66/A56(T) linking the M60/M62 with the M65 motorway - described as the 'bridge' in to Lancashire from Greater Manchester leading through to West Yorkshire. This connectivity and the proximity to Manchester make Rossendale highly accessible and able to play an important role within the sub-region and the Northern Powerhouse. However connectivity and accessibility using public transport is more limited and, as studies show, the strategic network is reaching capacity.

1.6 The distribution of current employment space in the Borough reflects the economic geography. Businesses are generally clustered in the west, close to the A56, whilst in the rest of the Borough, businesses are concentrated along the valley floors running east to west. Linear strands of businesses also follow the valleys running south to Bury and Rochdale, and north to Burnley and Accrington.

¹ Land uses falling under the Town and Country Planning (Use Classes) Order 1987 (as amended):

B1 (Business):

- a. Office other than a use within Class A2
- b. Research and development of products or processes
- c. For any industrial process (which can be carried out in any residential area without causing detriment to the amenity of the area)

B2 (General Industry):

Industrial process other than that falling within Class B1

B8 (Storage and Distribution):

Use for storage or as a distribution centre

² Please note that the NPPF was updated in 2018 and the new Framework supersedes the previous published version from 2012. Rossendale's Local Plan preparation began before the revised version was published. Additionally, much of the evidence base used to inform the preparation of the Local Plan was carried out prior to the 2018 NPPF – including the initial Employment Land Review.

2 Background

2.1 National Context

National Planning Policy Framework

2.1.1 The NPPF sets out the Government's planning policies for England and explains how they should be applied. It provides a framework within which locally-prepared plans for development can be produced. It emphasises that the purpose of the planning system is to contribute to the achievement of sustainable development involving three overarching objectives (economic, social and environmental).

2.1.2 In relation to the economic objective, NPPF states that the planning system should help build 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, innovation and improved productivity, and by identifying and coordinating the provision of infrastructure.

2.1.3 Paragraph 11 sets out a presumption in favour of sustainable development and, for plan-making, this 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 provide for objectively assessed needs for housing and other uses.

2.1.4 Paragraphs 20-23 go on to emphasise that strategic policies should provide an overall strategy for the pattern, scale and quality of development (including employment) and make sufficient provision for this. These strategic policies should address the Borough's strategic priorities, looking ahead at least 15 years, in order to anticipate and respond to long-term requirements and opportunities. A key diagram should indicate broad locations with a policy map identifying land use designations and allocations.

2.1.5 Paragraph 80 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

2.1.6 Paragraph 81 sets out that planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

2.1.7 Paragraph 82 states that policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Government's Industrial Strategy 2017

2.1.8 The Government's Industrial Strategy is considered to align well with Rossendale's infrastructure plans to open up new employment sites and provide road and rail infrastructure to support access to work. Rossendale Council is keen to further develop relationships with Government and the Lancashire Enterprise Partnership to deliver this strategy and benefit from Government programmes such as a local prosperity fund to bring forward sites to achieve growth.

2.2 Regional / Local Context

Rossendale's Economic Strategy 2018-33

2.2.1 The strategy highlights that significant business investment has taken place along the A56 corridor and west of the borough with recent development drawing in advanced manufacturing businesses. It recognises that a future supply of employment land in appropriate locations is essential to achieve planned economic growth and prosperity.

2.2.2 However, it also acknowledges that there are growing economic disparities within the borough, with some areas facing severe social and economic deprivation contrasting with areas of relative prosperity. The strategy aims to reduce the gap in the most deprived communities by ensuring all residents and communities benefit from economic growth, as well as benefitting from targeted specific initiatives. Part of this will require the identification of employment sites, alongside investment in associated infrastructure.

2.2.3 Of particular relevance to the Local Plan is "Priority 2" which seeks to attract large companies in recognised growth sectors. In particular this will involve building on the Borough's strength in advanced manufacturing which will serve to expand the economic base and provide better paid jobs locally. The Strategy also sets out a number of key actions which support the Local Plan including: securing the 27 hectares of employment land set out within the emerging Local Plan; bringing forward Futures Park and other prospective employment sites suitable for advanced manufacturing and spin out companies; lobbying for improvements to the M66, A56 and Gyratory to facilitate access and attract investment and developing a succession strategy for major inward investment, including identifying sites for the longer term.

Greater Manchester Spatial Framework (GMSF)

2.2.4 The GMSF is being prepared by all ten Greater Manchester (GM) authorities to set out proposals on how GM could be developed up to 2035. It considers locations for new housing and employment, and will identify required new infrastructure. The emerging "Northern Gateway" proposal is of particular significance to Rossendale for its economic benefits as it seeks to bring forward a large amount of industrial floor space and new homes along the M62 corridor at its intersection with the M66 in Rochdale, Oldham and Bury. Rossendale's Economic Strategy recognises that it is important to ensure that the Borough's residents have the right education and skills and the ability to commute to the Northern

Gateway (and also to Manchester city centre) so they are able to access job opportunities here.

Pennine Lancashire Growth and Prosperity Plan 2016-2032

2.2.5 This Plan has an ambition to accelerate economic growth and housing development in Pennine Lancashire, close the productivity gap and ensure Pennine Lancashire builds on its position as a major contributor to the Lancashire economy and the Northern Powerhouse. The Economic Development Strategy for Rossendale is seen as integral to supporting the vision for Pennine Lancashire including through the provision of good quality employment sites with improved connectivity to markets.

3 Evidence Base

3.1 Employment Land Review 2017

3.1.1 Rossendale Borough Council commissioned planning and development consultants Lichfield's to undertake an Employment Land Review (ELR), including an associated Employment Sites Review (ESR). This was published in February 2017 and informed the Regulation 18 stage Draft Local Plan. This was supplemented by a brief update in 2019 which provided further information on some of the original site assessments. The following section provides a brief summary of the main findings from the 2017 study and draws out relevant evidence that was used to inform the Local Plan.

3.1.2 The ELR had a number of elements:

- **Stage 1: Taking Stock of the Existing Situation:** analysis of the economic strengths and weaknesses of the local economy, functional economic area (FEMA), and an assessment of the fitness for purpose of a portfolio of employment sites.
- **Stage 2: Assessing B-Use Class Future Requirements:** testing the implications of different population/household growth scenarios on future employment space requirements for the Borough, including latest economic forecasts and housing requirements.
- **Stage 3: Identifying a Site Portfolio:** analysing the condition, status and functionality of existing employment areas, which sites should be retained to meet future employment needs and which released for alternative uses, and any need for additional sites in the area.

Taking Stock of the Existing Situation

Rossendale's Economy

3.1.3 The ELR recognises that Rossendale's economic context is reflective of its industrial past. The Borough has witnessed slower economic growth over the last 30 years compared to the rest of the country and region. This has been driven by a decline in traditional local industries such as textiles, clothing and footwear, which the area had been renowned for. Consequently, some of the former mill buildings are underutilised and, largely due to the Borough's topography, there are difficulties in finding suitable sites for employment uses. However, this also presents growth opportunities for the Borough - many of the mill buildings have potential to be renovated for new employment uses or housing. Targeted regeneration of key sites could act as a catalyst for wider growth in the future.

3.1.4 Table 1 sets out the figures available when the ELR was prepared (from 2015) and shows there were around 25,000 jobs in Rossendale – having decreased by 7.4% since 1997. In contrast, during this time, the North West and UK experienced job growth of 12% and 17.4% respectively. Since 1997, job losses have predominantly been in manufacturing industries with the number of jobs in textiles and clothing manufacturing, in particular, decreasing by 2,800 to just 400 in 2015 (the largest decrease of all employment sectors). In

other areas of the UK and North West, this has been mitigated or outbalanced by an increase in employment in the service sector. However, this has not been sufficient in Rossendale to outweigh the overall losses.

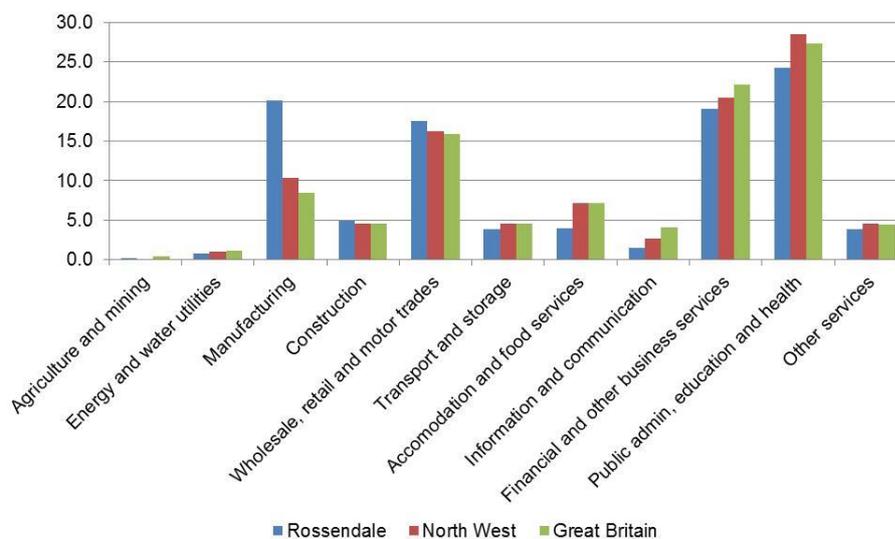
Table 1: Broad sector employment change in Rossendale 1997 to 2034

Sector	Employment Space	1997	2015	2034
		[No. of jobs]		
Construction	N/A	1,564	1,670	1,760
Education	D1	1,042	2,490	2,795
Health & social care	D1 / C2	2,189	3,230	4,140
ICT	B1(a) / B8 / Sui Generis	313	311	311
Leisure & recreation	A3 / C1 / D2 / Sui Generis	1,042	1,763	2,174
Manufacturing	B1(c) / B2	9,278	5,083	4,347
Public sector administration	B1(a) / A1	417	311	311
Retail and wholesale	A1 / B8 / Sui Generis	4,483	4,357	4,761
Services	B1(a) / A2	5,108	4,564	4,761
Transport	B8	1,355	830	932
TOTAL		27,000	25,000	26,600

Source: Experian (September 2016) UK Local Market Forecasts Quarterly – Workforce Jobs

3.1.5 The diagram below compares the sector distribution of employment in Rossendale to the North West and Great Britain. It shows that despite its decline in recent years, the manufacturing sector employs around twice as many people in Rossendale as it does in the North West or Great Britain. In contrast, jobs in Rossendale are under-represented in financial and other business services, as well as the public sector (such as education and health).

Figure 1: Percentage of employee jobs by sector (2014)



Source: ONS (2016) Business Register and Employment Survey

3.1.6 One of the ELR's conclusions is that, whilst Rossendale's economy has been through a challenging transition in recent years, with employment declining against national trends, there have been signs of resilience. Rates of unemployment and Job Seekers

Allowance claimants have been lower than comparator areas. Businesses are more likely to survive in Rossendale and there is a large base of businesses that have been operating for many years and have a real stake in its continuing success.

3.1.7 Whilst lower earnings in Rossendale are attractive to businesses they put local residents at a disadvantage. Low business start-up rates mean that new employment opportunities will mostly be driven by larger, established, businesses and job growth is forecast to be lower here than elsewhere. New employment sites have been identified as being needed for the future growth and prosperity of the area – to ensure that businesses remain and others are encouraged to locate in Rossendale.

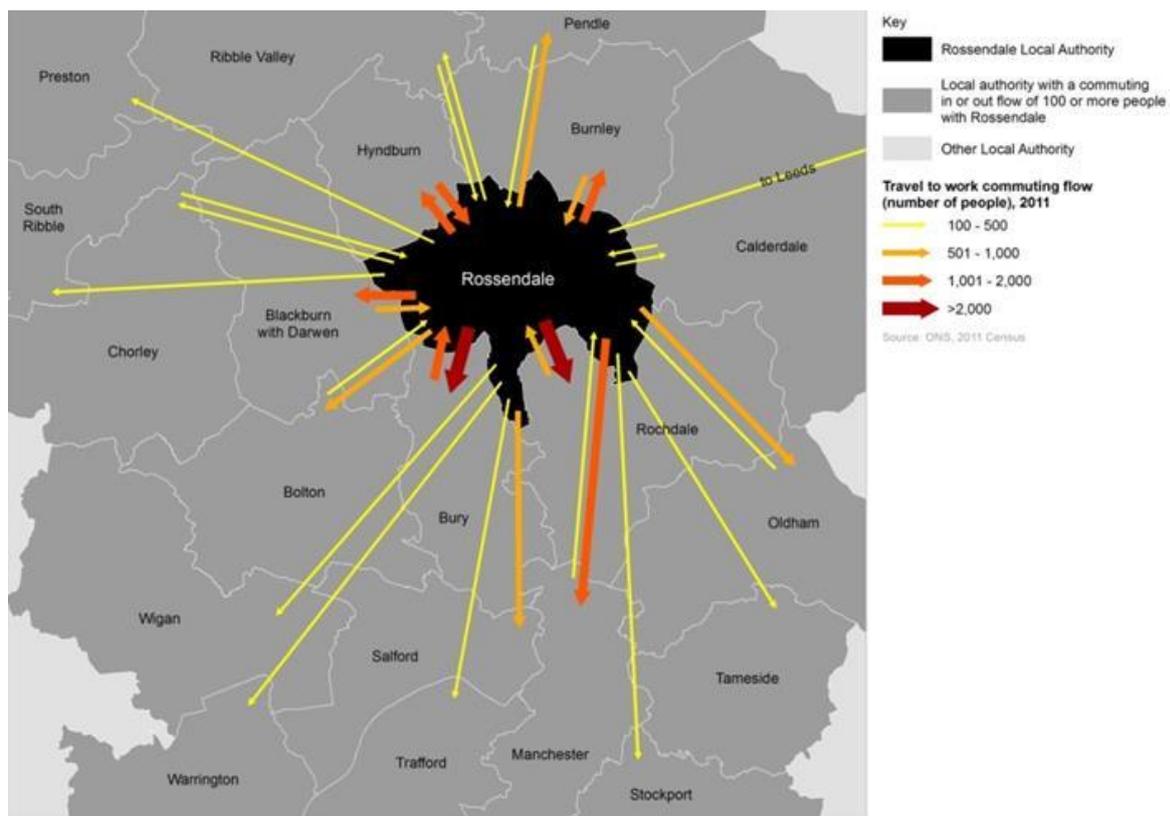
3.1.8 Whilst future growth is likely to be increasingly driven by the knowledge and service sectors, there is still a strong need for new industrial premises. This is particularly in the west where there is good access to the A56 and M66 corridor. There has been an undersupply of industrial sites in recent years, and the ELR found that unmet demand has been reported. There is a particular need for large sites around Rawtenstall and Haslingden.

Rossendale's Functional Economic Market Area (FEMA), Travel to Work Patterns and Out-Commuting

3.1.9 There is no universal definition of a FEMA but it can be characterised as the spatial area over which the local economy and its key markets operate. The geography of economic activity can be complicated as people often live, work and undertake leisure activities in different administrative areas and businesses operate on a local, regional, national or global scale. The ELR identified that Rossendale in isolation does not comprise its own FEMA but instead overlaps with adjoining Blackburn and Manchester Travel to Work Areas (TTWAs) and their corresponding economic geographies. This means that the patterns of economic activity and demand for premises in the Borough are likely to be focused to the west by the Blackburn TTWA and to the south by the Manchester TTWA.

3.1.10 Rossendale has a net outflow of 8,564 commuters so, whilst 7,576 people commute *in* to Rossendale, 16,140 people commute *outwards*. This reflects the fact that Rossendale Borough boundary overlaps with multiple TTWAs and residents commute into other FEMAs, as shown in the diagram below:

Figure 2: Rossendale Commuter Flows



Source: ONS (2015) Census 2011, Lichfields analysis

3.1.11 A large number of these commuters travel to Greater Manchester (GM) for work, with more than a quarter (8,903) of Rossendale’s working residents commuting to the ten GM local authorities. There are also significant flows of at least 1,000 commuters from Rossendale travelling to each of the following areas: Burnley, Hyndburn and Blackburn with Darwen. The patterns of in-commuting follow similar trends: most people commute into Rossendale from the surrounding Boroughs of Hyndburn and Bury.

Consultation with Neighbouring Authorities

3.1.12 Throughout the preparation of the ELR, consultation was held with officers from Rossendale and neighbouring local authorities. It was identified that, although some surrounding local authorities have strong commuting and migratory relations with Rossendale, none of them have specifically requested that Rossendale should take on any of their employment land shortfall, or vice versa. This has been confirmed during more recent discussions and is detailed in the Duty to Cooperate Statement.

3.1.13 To summarise, the ELR identified the following key issues in relation to the existing situation:

- Out-commuting to neighbouring areas for work (particularly to Rochdale, Bury and Burnley) remains a major issue, with a net loss out of the Borough of over 8,500 residents per day.
- Rossendale has a low job density ratio³ compared to the North West; rebalancing the land uses of the Borough to ensure that more, and better quality, jobs are provided could help to reverse this trend and ‘claw-back’ out-commuters.
- If high levels of new homes are to be created, the number of economically active residents is therefore likely to correspondingly increase, creating a need for more employment land.

³ Jobs density is defined as the number of jobs in an area divided by the resident population aged 16-64 in that area. For example, a job density of 1.0 would mean that there is one job for every resident aged 16-64.

Assessing B-Use Class Future Requirements

Demand forecasts

3.1.14 The ELR provides an overview of the current stock of B-class employment space in the Borough, summarising recent trends and changes to supply and consideration of future economic growth needs. Part of this was the analysis of various economic scenarios which generated a range of future requirements to be further considered. This assessed various higher or lower growth forecasts in both the number of jobs and in the amount of future labour (i.e. the number of residents in the area) which could be available. This was then measured against historic delivery of employment land. The scenarios were based on the following data:

Job growth:

- Experian's Local Market Quarterly Forecasts (September 2016);
- Using Experian's data but reassessing this to take account of specific target growth sectors in Lancashire and local growth preferences;
- Core Strategy Job Growth target

Labour supply:

- 2014-based Sub National Population Projections (SNPP) (which results in 183 dwellings per annum [dpa]);
- 2014-based SNPP/PCU (partial catch-up) re-based to 2015 (202 dpa); and
- Long Term Migration trends (220 dpa).

3.1.15 The next stage was the identification of a flexibility margin: to provide some flexibility of provision a modest allowance is added to the net requirement as a contingency factor. This makes sure the supply is not too tightly matched to estimated demand, allowing for a margin of choice. This helps to avoid shortages of land if there are either delays in sites coming forward or if future demand is greater than forecast. This was followed by consideration of new land that will be required to replace any existing employment land and premises that get developed for other uses in the future.

3.1.16 The ELR then draws recommendations from this to identify future employment land needs for office and industrial space. It was recognised that a purely quantitative assessment would not be appropriate as there are a number of qualitative factors (and local circumstances) that need to be taken into account - this then provides a balance between market realism and economic and planning policy objectives.

3.1.17 The main conclusions from this analysis were:

- Future realisable demand may be restricted by the current poor and ageing existing stock, particularly in the east, which no longer meets the needs of modern businesses; this is compounded by the lack of infrastructure investment, limited number of industrial estates/business parks, and weak inward investment (relative to neighbouring areas such as Greater Manchester and other parts of East Lancashire);
- In particular, there are several old mill buildings, many of which are in need of renovation or replacement. The poor quality of existing premises supports the case for allocating new land in areas of stronger demand so that new premises can be built and better respond to market demands;
- There are high levels of demand for employment space from smaller businesses across the Borough and ensuring a supply of flexible space suited to the needs of Small to Medium Enterprises (SMEs) will be important to help them grow.

3.1.18 In relation to specific employment land types:

- Gross annual take-up of B-class employment uses have been relatively low with the main cause identified as a lack of suitable sites (largely due to steep

topography and flood risk in the area). There has also been a corresponding loss of employment space, leading to a net reduction since 2005-06;

- There is a lack of good quality, small to medium-sized industrial premises, which is suppressing demand – in particular, for local businesses wishing to expand;
- There is an underlying demand for B2 (General Industrial) premises and, to a lesser extent, B8 warehousing;
- Whilst there is a short-term oversupply of office accommodation, the quality of much of the existing stock does not meet the expectations of most businesses. Therefore, to meet the forecast growth in the services sector, there will be a need to supply new, good quality office accommodation.

Identifying a Site Portfolio

Site assessment methodology

3.1.19 The ELR went on to look at the current employment site portfolio, assessing the characteristics and quality of existing and allocated employment sites – as well as their suitability to meet future employment development needs. This assessment focussed on sites that were either currently in use for employment or had been allocated for employment use in the previous plan. In addition, sites with an extant (current) planning permission for employment were considered and further potential sites were also identified.

3.1.20 The assessment looked at issues such as: physical limitations (e.g. road access, infrastructure, ground conditions, flooding, contamination); potential impacts on landscape and heritage; appropriateness and likely market attractiveness, including vacancy and market activity; barriers to delivery; and environmental/amenity impacts on neighbouring areas. Further considerations such as policy status, planning constraints and suitability were also assessed, alongside findings from consultation with commercial land agents and wider council officers. It should be noted that the site assessments were not informed by detailed site investigation work, site ownership information or viability analysis.

3.1.21 Greater weight was given to sites which were felt to best respond to market needs and where any identified constraints could be overcome, with appropriate mitigation, through the planning process. It is important to note that the ELR downgraded sites which were considered to have significant impediments (such as contamination, or a Green Belt location). This is because the assessment adopted a ‘policy-on’ approach in that it assessed sites as they would be considered if a planning application for their (re)development were to come forward today (albeit not in as much detail as for a real application).

3.1.22 As such, it is acknowledged that the assessments were a point in time and may change. That is, if any site constraints were to be removed in the future (such as policy constraints, access improvements, site contamination/ remediation), the scoring of a site would be likely to improve.

3.1.23 This led to a criteria rating for each site of ‘very good’, ‘good’, ‘average’, ‘poor’ and ‘very poor’ which were intended to give a broad indication of the overall quality of employment land supply rather than a comparison of one site against another. The ELR emphasises that the assessment process did not necessarily provide a complete picture of the local significance of certain sites. For example, a site could be assessed as having the potential to satisfy particular business and sector needs (which might favour the retention of the site) even if it does not perform well against conventional site assessment criteria. A wider commentary was therefore provided to supplement the formal rating exercise.

3.1.24 In total, 120 different sites were assessed in the ELR, including 69 existing or allocated sites (approximately 198 ha of land), as well as a further 0.7 ha with an extant permission for B-class uses. An additional 51 potential future employment sites identified by the Council and Lichfield’s were also assessed to determine their suitability for employment uses.

Site assessment findings

3.1.25 The ELR found that just over a quarter of assessed sites were rated as poor or very poor, particularly in the eastern part of the borough, reflecting weaker demand and poorer strategic road access. 45% were rated good or very good with less than a third rated as average. As most of existing sites are largely built out, the average net developable area available was identified as only 0.2 ha per site.

3.1.26 The quality of sites was found to be a particular issue in Bacup, Waterfoot and Stacksteads where there are a significant number of old mill buildings, many of which are underutilised and have higher vacancy levels.

3.1.27 However, whilst much of the existing space was rated below average, some of it serves a particular market segment for those local occupiers who actively seek lower rents. This creates a challenge when the stock in general needs to improve in quality to meet modern requirements but where replacing stock would risk dispersing the low cost end of the market. This low cost stock remains popular particularly for small-medium sized industrial units (demonstrated by the low vacancy rates for B2/B8 in general). In practice, current market conditions are likely to weigh in favour of retaining older poor quality stock, particularly as viability is an issue for redeveloping older premises. However, when opportunities arise, there is a need to encourage the renovation or replacement of older premises to make them more fit for purpose for modern business.

3.1.28 Many of the sites were occupied by a few key employers, with each employer having several premises spread across multiple sites. The ELR states that there is a clear, strategic need to find large, accessible new sites to retain these employers within Rossendale which would also help to unlock existing sites for other users.

3.1.29 Overall, the assessment of existing sites indicated that the Borough has a range of sites of varying quality and type. However, in particular, it identified a shortage of large, modern sites with good access to transport links. Much of the existing stock is in older buildings, many of which are former mills. Whilst several have been modernised, the majority do not meet the needs of modern businesses. Additionally, many established employment sites are located close to water courses so, as well as viability issues in general, flood risk can be a further constraint on redevelopment.

3.1.30 The conclusion from these assessments was that there are too few good quality, unconstrained and available employment sites to meet demand, particularly in the west of the Borough. This is exacerbated by the fact that most of them are already fully developed, such as the existing Carrs and Knowsley Road Industrial Estates (which are both popular sites due to their linkages with the A56 and M66).

Future land requirements

3.1.31 The review goes on to match forecasts of future employment land requirements against the availability of existing sites in order to understand the extent to which new allocations may be required. The ELR sets out a broad comparison of estimated demand for B-class space against the estimated supply (as set out in Table 2 below). This indicates that, currently, the Borough does not have sufficient employment space in quantitative terms from 2014 to 2034 to meet future needs.

3.1.32 The ELR suggests a number of options to address the issues identified. As well as policy mechanisms, such as the use of Section 106 monies to improve existing stock and sites and supporting the refurbishment or redevelopment of poorer quality premises, it also made recommendations for the allocation of new industrial sites. This would increase the current choice of sites and provide new development opportunities of the size and scale necessary to let local businesses expand. This is both for businesses already in the area

and those looking to move into the Borough (with agents reporting that there are examples of businesses looking to move to Rossendale because of its links to the motorway network).

3.1.33 The ELR states that on the basis of the above considerations, a range of **between 22 and 32 hectares (ha) (gross) of employment land** may be considered appropriate for the period to 2034. This aligns with the preferred strategy for increased housing, the need to revitalise existing poor quality stock, the imbalance in the current stock in relation to sizes of premises available, continued demand for B2 (particularly from local companies) and the emerging business services sectors, whilst also being realistic about continued economic uncertainty and the physical constraints of the area.

Table 2: Demand/Supply of B-class Employment Space in Rossendale (to 2034)

	Demand and supply balance (ha)
Requirement for B-class employment space	22 to 32 ha
Adjusted existing supply of B-class employment space (net)	16.4 ha
Surplus (+) / Shortfall (-)	-5.6 ha to -15.6 ha
Additional existing sites recommended for mixed use development which may supply B1 class employment space (net)*	0.51 ha

*It was not possible at the ELR stage to quantify the amount of B1 class employment development which would come forward as part of a mixed use scheme. Therefore this has not been factored in to the demand and supply balance calculation.

3.1.34 In relation to the specific uses for any identified employment land, the ELR suggests an indicative split of around 40% for B1c/B2 manufacturing land, 40% for B8 warehousing and the remaining 20% for new office space.

Location of employment land

3.1.35 Even where no quantitative shortfall of employment space is identified, in some circumstances additional land may still be needed for qualitative reasons, in order to:

- Improve the choice of provision for occupiers;
- Meet gaps in the supply of particular types of premises;
- Improve or modernise the quality of current provision and so help attract more occupiers; and/or
- Provide a better spatial distribution of employment sites to meet the needs of different settlements.

3.1.36 In addition, the ELR reports that consultation with local businesses indicated that, whilst 52% of them expect their space requirements to expand, only 47% are looking to expand on their current site. A quarter of those that would consider relocating in order to expand were looking outside the Borough. Nearly half stated that a lack of suitable premises was an obstacle to their growth in Rossendale and 12% reported a lack of affordable premises as a barrier. As mentioned, key employers occupy multiple dispersed sites but, in order to stay competitive, they will need to amalgamate into a smaller number of large sites in future. If demands for large, available sites cannot be met within Rossendale, these businesses will have to look elsewhere. These findings were confirmed by commercial agents who stressed that there was a mismatch between the location and quality of the supply of sites with what the market is demanding.

3.1.37 The ELR recommends that, due to current economic uncertainty, the focus should be on sites in areas of strongest market demand – and, in particular, to provide further industrial and warehousing allocations. Although econometric projections suggest a potential growth in office jobs over the plan period, there are concerns regarding the amount of office space

that is required. This is because the office market remains relatively weak and significant allocation of office sites could weaken their attractiveness, especially as there are already high vacancy rates. Despite this, however, the ELR recommends at least some new office land is allocated or to extend an existing better performing site in order to provide choice and flexibility. This may also help to attract larger office occupiers that up to now have not chosen to locate in the Borough. This would provide the opportunity for high quality office space in areas that continue to attract strongest demand (such as the Rawtenstall area) and that can provide longer term, sustainable and viable opportunities.

3.2 Highway Capacity Study

3.2.1 This study was undertaken to support the transport evidence base for the Local Plan. It considers the development impact on the principal highway network within Rossendale and identifies the mitigation measures that are required to ameliorate the impact of the local plan for development sites, including employment land.

3.2.2 The study determined that highway mitigation would not be required within the first five years of the plan but that interventions will potentially be needed at some locations in order to deliver the remaining build out of the plan period to 2034.

3.3 Rossendale Employment Sites Study

3.3.1 This study was undertaken to provide a review of potential access arrangements to a number of employment sites identified in the Local Plan and was designed to be read in conjunction with the Highway Capacity Study. The objective was to provide an understanding of the site-specific constraints associated with each proposed employment site, and the mitigation that is required to make these sites deliverable from a highways and access perspective.

3.3.2 This concluded that access could be provided to all sites but a series of constraints and issues were identified at certain locations which may impact upon the final costs/designs of the schemes proposed. Following the conclusion of this study, the recommended next steps included:

- Geotechnical investigations at Land North of Hud Hey (NE2) and Carrs Industrial Estate (NE3);
- Additional Traffic Count information at specific locations;
- Progression to a more refined level of design (detailed).

3.4 Strategic Housing Land Availability Assessment (SHLAA)

3.4.1 The SHLAA is an assessment of land availability which has been carried out to identify a future supply of land which is suitable, available and achievable for housing development over the plan period (as required by NPPF). The most recent SHLAA was published in August 2018 and updated the housing land supply position for the period 2018 to 2033.

3.4.2 The SHLAA considered a number of existing employment sites for their suitability for housing, as well as assessing potential new development sites. This helps to confirm whether existing employment sites should be retained in their current use or whether they may be better suited for residential development.

3.4.3 A number of the sites looked at as part of the ELR have subsequently gone on to be recommended as housing allocations, whilst others are considered most suitable to remain in, or be allocated for, employment use. There are a number of reasons why existing employment sites may be recommended for redevelopment for other uses. For example: the site may no longer be fit for purpose or does not meet the needs of modern business; it may have become vacant and there is no prospect of a future employment use taking over

the site; circumstances may have changed around the site which mean continued employment use is no longer viable or appropriate – for example residential development may have taken place or have been granted permission within or near the site which changes the character of the site.

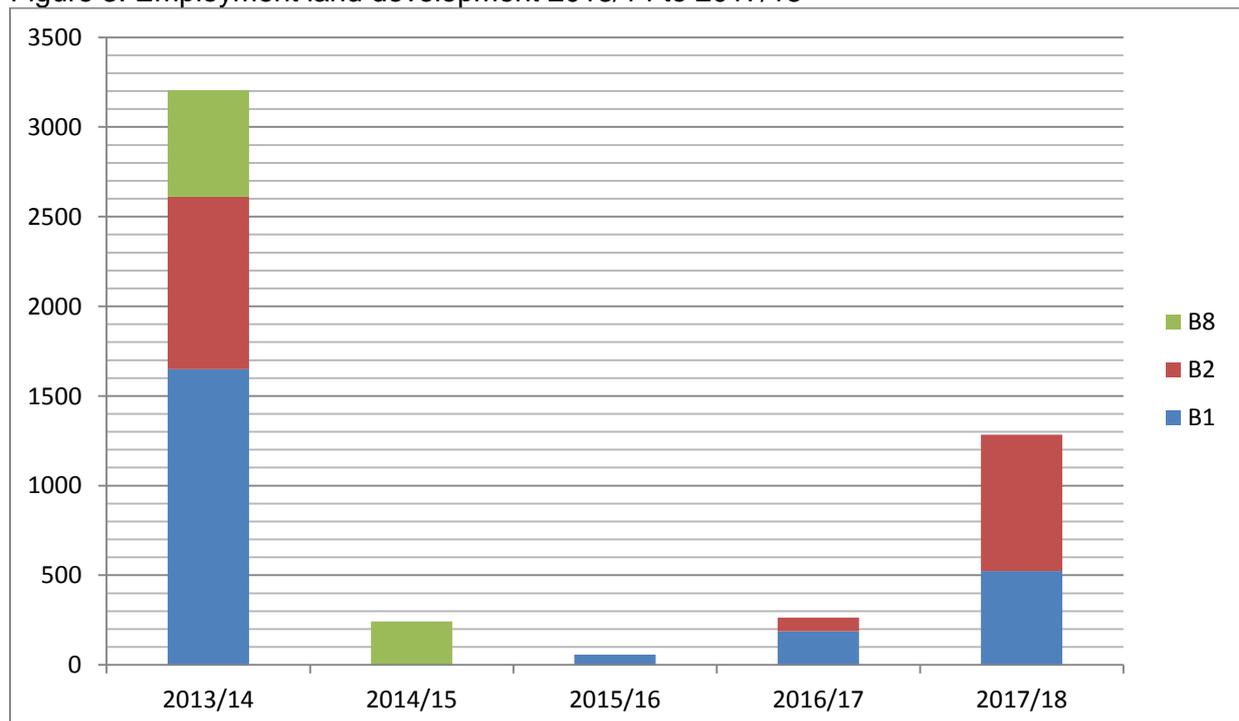
3.5 Authority Monitoring Report (AMR)

3.5.1 The Council produces an annual report which monitors various targets and indicators from planning policies (as at 1st April of each year). The latest report presents monitoring results for 2017/18. Whilst the AMR is still reporting on the 2011 Core Strategy (as this was the most recently adopted Plan), it provides a useful general update on development of various land uses, including employment land. Table 3 below shows the delivery of employment development in the Borough for the last five years. This includes new build as well as conversion and change of use of existing properties and land.

Table 3: Employment land development 2013/14 to 2017/18

Year	Floorspace completed (m ²)			TOTAL
	B1	B2	B8	
2013/14	B1a: 632 B1c: 1018	960	596	3206
2014/15	0	0	242	242
2015/16	B1a: 58	0	0	58
2016/17	B1c: 187	77	0	264
2017/18	B1a: 524	761	0	1285
TOTAL	2419 (B1a: 1214 B1c: 1205)	1798	838	5055

Figure 3: Employment land development 2013/14 to 2017/18



3.5.2 Table 3 and Figure 3 show that a total of 5055m² (just over 0.5ha) of new employment space has been developed since 2013/14. This is a relatively small amount of development and some of this may have involved change of use from one form of B-use class to another which means that the net gain of employment land is actually less than this. Additionally, there have been relatively significant losses of allocated and existing employment sites to retail (e.g. New Hall Hey), residential and other non B use classes.

3.6 Green Belt Review

3.6.1 Within Rossendale 3,177ha of land currently exists as Green Belt out of a total area of 13,800ha. This equates to 23% of the total land area of the Borough. The Plan proposes the loss of 27.54ha of Green Belt for housing and employment development which amounts to less than 1% of the current Green Belt total. Overall less than 10% of the land in the Borough is currently urban.

3.6.2 In relation to employment land, Green Belt release is proposed for the following sites:

- **NE1, Extension to Mayfield Chicks, Ewood Bridge (2.81 ha)** - an existing employment area already exists to the south of the proposed Green Belt release. The Green Belt Study identified that the land is suitable for release and would have defensible boundaries.
- **NE2, Land north of Hud Hey near Acre (2.7 ha)** – although this site was not recommended for release in the Green Belt Study because of its role in separating Haslingden and Rising Bridge discussions with developers indicated strong interest due to its proximity to the A56. There is also an overall shortage of suitable employment sites close to the A56.
- **NE4, New Hall Hey Extension (5.2 ha)** - land at New Hall Hey (west of the river- the east side is not Green Belt) was not recommended for release in the Green Belt Study or supported by the Landscape Study. However, this is considered to be outweighed by the need to provide suitable employment land close to the A682 and A56 corridor acting as a Gateway site to Rossendale's town of Rawtenstall. Developers have also shown interest in this land.

3.6.3 The exceptional circumstances for Green Belt release in relation to employment allocations were largely based on the need to provide a balanced employment and housing and employment supply in a District with challenging geography, viability issues and access constraints. Whilst the need for employment land identified through the ELR can partly be provided through intensification of existing sites, this has limited scope and there is a need to find new developable land in locations where the demand is (i.e. the A56 corridor). Unfortunately as the land identified as the most suitable and in the right location is currently in the Green Belt, it has been necessary to propose a limited amount of this for release. It should be noted, however, that all these sites are located immediately adjacent to the urban boundary and existing employment sites.

3.6.4 The ELR suggested a number of locations within the A56 corridor, most of which were in Green Belt. One large Green Belt site between the A682 and Tesco Haslingden was discounted for a range of reasons including issues with access, infrastructure easements within the site and the presence of an ecological corridor. Another Green Belt site at Hollin Gate Farm, Rising Bridge suggested by Lichfields was consulted on within the Regulation 18

Plan (site EMP2:38) but drew a range of objections, including in relation to the road access and is not being pursued. There was also doubt over the availability of the site.

3.6.5 More information can be found in the Green Belt Topic Paper.

3.7 Strategic Flood Risk Assessment (SFRA)

3.7.1 The SFRA has been carried out to help understand the potential extent and severity of flood risk throughout the borough and make recommendations on the suitability of potential development sites in relation to flood risk. This has informed the choice of land allocations in the Local Plan and several sites have not been proposed for allocation on this basis. In other cases, flood risk has been identified as an issue which needs to be addressed before development could be progressed on the site.

3.8 Sustainability Appraisal (SA)

3.8.1 The SA considers the social, economic and environmental performance of the Local Plan. This has been undertaken at both the Regulation 18 and 19 stages of the Plan and has assessed the policies and potential site allocations.

3.8.2 In relation to the employment policies, the SA identifies mainly positive or neutral effects, with particular benefits for economic objectives through providing employment in the borough and contributing positively to the Borough's economy. Positive environmental effects are noted where policies encourage the re-use and conversion of historic buildings, seek measures such as landscaping and encourage development in areas which are well served by public transport.

3.8.3 Mixed use sites, new employment allocations and existing sites with larger developable areas were assessed through the SA. As would be expected, these scored well for economic objectives. However, there were some minor negative effects noted on a range of issues whilst major negative effects were identified in relation to flooding. The sites with major effects identified were NE1 (Extension to Mayfield Chicks, Ewood Bridge), and mixed use sites at M4 (Futures Park, Bacup) and M5 (Park Mill, Helmshore). More detail on how this has been taken into account can be found in the Flood Risk Topic Paper.

4 Choice of Employment Sites in Rossendale Local Plan

4.1 Choices had to be made over how much land should be allocated for employment (and whether this involved new sites being identified) and then which specific sites should be allocated or protected for employment.

Amount of allocated land

4.2 Policy EMP1 in the Local Plan states that the Council, together with developers and other partners, will seek to provide sufficient land to meet the Borough's requirement of 27 hectares for B1, B2 and B8 use for the period up to 2034. It goes on to state that this figure is intended to meet Rossendale's employment space needs in full so that its economy is not constrained whilst recognising that developments in adjoining areas will remain a key influence.

4.3 This figure is based on the ELR's recommendation that between 22 and 32 hectares of employment land should be allocated. The Council have chosen a mid-way point of 27 hectares as the lower figure of 22 ha is only based on past take up of employment land which is recognised as being low. This low take up is not because of a lack of need or demand but because of a lack of suitable sites which, in itself, is seen to be constraining

growth. The higher figure has also been ruled out because, as the ELR points out, if the Council opted for the top end of the range, it may need to consider a higher level of housing delivery or have sufficient weight behind policies which ensured that the labour force would remain high enough to warrant this increased employment land supply. For example, policies that had the ability to ‘claw back’ out-commuters and planning for a mix of housing that specifically encouraged retention of economically active residents or would attract younger economically active people into the Borough. Whilst these aims are supported, it is recognised this may be difficult to achieve in full without strong policy intervention. The mid way point is therefore felt to provide an appropriate balance between these two positions. The amount also correlates with the scenario might best matched the housing need in the Local Plan.

Identification of specific sites

4.4 The process of assessing specific employment sites that could contribute to meeting the need for new land was based firstly on the conclusions of the ELR. These were then refined further with reference to the Council’s own detailed site assessments and also to the conclusions of other studies such as the SHLAA, Green Belt Review and SFRA.

4.5 Sites for consideration were identified from a number of sources including allocations identified in previous plans, other land currently in employment/mixed use, suggestions from Lichfield’s and Council officers and Call for Sites submissions. A total of 120 sites were initially identified and their suitability and deliverability for employment were assessed in the ELR.

4.6 The ELR produced individual Site Profiles for each of these, which included a summary of the characteristics and assessment of each site and an overall rating of quality, with a recommendation regarding the potential for allocation. This information was then considered as an additional factor within the Local Plan site assessments.

4.7 The further assessment considered the sites for their potential to be allocated for New Employment or Mixed Use (to include an element of B use development) or to be retained as a protected employment site⁴. Of these:

- 5 have been allocated as “New Employment” – with the prefix NE (3 of which involve Green Belt release);
- 5 have been allocated as “Mixed-Use” sites (4 of which include an element of B-class use whilst site M5 Park Mill, Helmshore is allocated for A1 and A3⁵);
- 51 are identified as “Existing Employment” and are protected for employment under Policy EMP3.

4.8 A further 10 sites considered for employment have been allocated for housing, as they were deemed most suitable for this use (for example, they may previously been in employment use but have gained planning permission for housing during the assessment) and 2 were considered most appropriate to form part of designated Green Infrastructure within the Local Plan.

4.9 47 sites from the initial list have not been specifically allocated for development in the Local Plan (although they may be within the urban boundary or part of wider designations such as a town centre boundary), for a variety of reasons:

- The site may have since been developed for other uses;

⁴ Please note that, of the original sites assessed in the ELR that went on to be identified as employment sites, some of the site boundaries have been amended for the purposes of the Local Plan. For example, the ELR assessed the Mayfield Chicks site at Ewood Bridge as one large site, including the proposed extension. This was split into two sites in the Local Plan, separating it into a “New Employment” site (NE1) and showing the existing employment site as site EE10.

⁵ A1 (Shops); A3 (Food and drink)

- It was felt most appropriate not to specifically protect the site for employment in order to allow flexibility with its future redevelopment;
- The site was located in Green Belt where it was not considered appropriate to be released e.g. the potential benefit of development was not considered to outweigh the negative effect on the openness of the Green Belt;
- The site was in a countryside location where it was not felt appropriate or possible to incorporate it into the urban boundary;
- Other constraints such as flood risk meant it was not considered suitable for allocation.

Table 4: Employment Site Allocations – summary⁶

Type of site	Gross Area (ha)	Estimated Net Developable Area (ha)
New Employment Allocations	23.01	19.95
Mixed-use Allocations	8.23	2.56
Existing Employment	154.78	5.46
TOTAL	186.02	27.97

4.10 Table 4 above shows that there are relatively few sites presented as new in the Local Plan with the majority being in existing employment use. The distribution of new employment sites is focussed to the west of the Borough, in areas of strongest market demand, which are also where the better quality and larger sites are available. Much of the land identified has already been built out so whilst the total land to be allocated comprises 186.02 ha, the actual net amount of developable land is only 27.97 ha⁷. Even where land remains undeveloped, inevitably a proportion of the site will not be able to be built on for reasons of, for instance, ecology, amenity or flood risk. The amount of floorspace to be delivered on each site will be further reduced when space for roads, landscaping and other infrastructure is taken into account.

4.11 The lack of potential new sites in other areas, particularly in the east (because of a lack of suitable land and due to differing markets and affordability), means it is also important to protect existing employment areas from loss to other uses.

5 Comments to draft Local Plan (Regulation 18) and changes made

Comments on Regulation 18 consultation

5.1 A large number of comments were received relating to employment land policies and allocations to the Regulation 18 consultation. These ranged from:

- Requests to amend land uses on certain sites – for example to change an employment allocation to housing or mixed use;
- Objections to specific allocations (the sites receiving most comments included Land North of Hud Hey, Carrs Industrial Estate extension – both in Haslingden – and Land adjacent to Hollin Gate, Rising Bridge); and
- Strategic and specific comments from bodies such as Highways England, Lancashire County Council and the Environment Agency (these comments were largely around the need to carefully consider the impact of new proposals on, for example, the Strategic Road Network and on flood risk).

⁶ Please note that the figures shown here are taken from the Errata document which corrected the numbers shown under Policy EMP2 in the pre-submission version of the Local Plan

⁷ Please note that there is a requirement of 27 hectares of employment land but the actual amount of space allocated adds up to nearly 28 hectares.

Changes made between the Regulation 18 and Regulation 19 consultation stages

5.2 7 sites were shown as “New Employment” at Regulation 18 stage. Two of these (referred to as EMP2.26 and 2.34 in the previous draft) were merged into one site (NE4, Extension of New Hall Hey, Rawtentstall) in the Regulation 19 Local Plan.

5.3 The proposed New Employment site at Rising Bridge (referred to as EMP2.38, Land adjacent to Hollingate Farm) was another proposed Green Belt release site but was not taken forward to Regulation 19 stage. This was following objection to the site at Regulation 18, access constraints and uncertainty over the availability of the site.

5.4 A new mixed use site (M1 Waterside Mill, Bacup) has been included in the Local Plan in order to encourage redevelopment of this derelict site. The building is Grade II listed and a mixed use allocation allows for a degree of flexibility to be applied in order to maximise the chances of a viable scheme coming forward.

5.5 The Gypsy and Traveller Transit site originally proposed at Little Tooter Quarry, Sharneyford (site ref. HS16.1) was relocated to become part of the mixed use allocation at Futures Park (M4). See the separate Gypsy and Traveller Topic Paper for more information.

5.6 One significant local business (Winfield’s plc.) provided a representation to the Local Plan in support of the allocation of land at Hud Hey for mixed use or entirely residential site instead of an employment allocation. They state that much of the site has remained vacant despite being allocated for employment for some time and the status of the site has changed with the retail permission at Britannia Mill. The fact that it is a brownfield site, close to services and public transport and existing highway constraints make the land more suitable for residential use.

6 Conclusion

6.1 This paper has summarised the evidence base relating to the development of employment policies and the choice of allocations to include in the Local Plan. It demonstrates there is a need to address issues with the existing supply of employment land in the Borough which currently suffers from a lack of fit for purpose, good quality premises and large, accessible sites in the right locations.

6.2 The Local Plan has identified enough land to meet the identified requirement of 27 hectares of employment land to accommodate future economic growth, as well as protecting existing employment sites. This helps to balance expected housing growth against the need to ensure that existing and future residents who choose to live in Rossendale will have the opportunity to access jobs and business premises in their local area.