

## **Rossendale Local Plan Examination in Public**

Matter 8 (Approach to site allocations and Green Belt release)

### **Hearing Statement on behalf of Anwyl Land**

**August 2019**

**Relevant Site:**

Land at Exchange Street, Edenfield (Part of Housing Allocation H72 – Land West of Market Street, Edenfield)

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## 1 Introduction

- 1.1 This statement has been prepared on behalf of Anwyl Land and responds to the Issues and Questions raised by the Inspectors in July 2019.
- 1.2 For clarity, this Statement relates to the continued promotion of land at Exchange Street, which forms the southernmost part of the wider proposed Housing Allocation H72 (Land west of Market Street, Edenfield). Up until this point, previous Local Plan representations relating to this site have been submitted by the landowner The Methodist Church. Anwyl Land now have an agreement in place with the Methodist Church and so will be promoting the land at Exchange Street, Edenfield through the remainder of the Examination process with an intention to develop housing at the site.
- 1.3 The parcel of land being promoted by Anwyl Land is accessed via Exchange Street and is capable of accommodating around 90-100 homes. Land to the immediate north forms part of the same allocation and Anwyl Land (as the Methodist Church did before) have engaged with Taylor Wimpey and Peel who are the other landowners in order that the whole allocation is delivered in a co-ordinated manner.
- 1.4 Anwyl Land (represented by Hive Land & Planning) intend to participate in the Matter 8 Hearing session being held on Thursday 26th September 2019 and trust that this Statement assists the Inspectors in respect of the Examination.

## 2 Matter 8 – Approach to site allocations and Green Belt release

2.1 This section provides Anwyl Land’s response to the following Issue raised under Matter 8:

*“Is the Plan’s approach to identifying site allocations (housing, employment and mixed use) and Green Belt releases soundly based and in line with national policy? Do the allocation policies provide a clear and effective framework for growth?”*

2.2 Each of the Inspectors questions are now addressed accordingly.

### Site assessment

#### a) How were potential site options identified as part of the preparation of the Plan?

2.3 Anwyl Land have no specific comments to make in response to this question.

#### b) What uses were the sites assessed for? Was mixed-use development routinely considered?

2.4 Anwyl Land have no specific comments to make in response to this question.

#### c) Is the site assessment methodology robust and based on an appropriate set of criteria? How have results from the Sustainability Appraisal, Green Belt Review and other studies been factored into the site selection process?

2.5 Annex 1 of the Housing Topic Paper (EB006) provides details of the site selection process that has been undertaken in respect of the proposed Housing Allocations. As required by paragraph 67 of the NPPF, the 2017 SHLAA (EB005) has been used as the primary source to help identify a sufficient supply and mix of sites.

2.6 A logical approach was then taken when discounting sites. The initial identification of sites was considered from a ‘policy-off’ position and then from a strategic policy perspective, sites were considered within the context of the findings the Sustainability Appraisal and the Spatial Strategy.

2.7 A logical, staged approach was then taken with sites within the existing urban boundary considered first. It was evident (and this is consistent with the persistent under-delivery of housing in Rossendale)

that there was an insufficient quantum of housing from this source of supply to satisfy the overall housing requirement.

- 2.8 At this point, sites within the countryside were then assessed in respect of their deliverability and developability. A number of sites within the countryside were discounted on the basis that they were remote from local services and public transport. Another key consideration in this regard was the findings of the Landscape Assessment study (EB025) because much of Rossendale is characterised by valley formations and moorland fringe and so the negative impact that development would have on these characteristics was an important factor. Other factors that restricted the quantum of available and suitable sites from this source were accessibility, the willingness of landowners to develop the site, physical constraints and environmental impacts based upon the location of the Ecological Networks (EB026) and the Environmental Network Study (EB024). Again, following this exercise insufficient land was available to meet the overall housing requirement and so Green Belt locations were considered.
- 2.9 Within the Green Belt, previously developed locations were considered first and the Green Belt Review was then used to establish any suitable locations for Green Belt release taking into account the five purposes for including land within the Green Belt set out at paragraph 134 of the NPPF. Housing Allocations were then identified on the basis that they could also fulfil the other criteria that all sites have been subjected to, as well as the spatial strategy for the borough.
- 2.10 Anwyl Land are therefore satisfied that the site selection process has been robust and that the evidence base has been sufficiently utilised when discounting sites and selecting appropriate Housing Allocations.

**d) Are the reasons for selecting site options, and rejecting others, clearly set out and justified?**

- 2.11 Anwyl Land support the approach that has been taken and have no other specific comments to make in response to this question.

**e) Has the sequential test, and exception test where necessary, been correctly applied in the assessment of flood risk on potential development sites? Is this adequately evidenced? Are there any outstanding concerns from the Environment Agency?**

2.12 Anwyl Land have no specific comments to make in response to this question.

**f) Are changes made to the list of proposed allocations between Regulation 18 and Regulation 19 Plan justified and supported by appropriate evidence? Are all de-selected sites unsuitable for development or not available?**

2.13 Anwyl Land have no specific comments to make in response to this question.

### Green Belt

**g) Has a comprehensive assessment of capacity within built-up areas been undertaken? Have all potential options on non-Green Belt land in the countryside been assessed?**

2.14 As set out in our response to question (c) above, Anwyl Land are satisfied that all options for development in the existing urban areas and non-Green Belt locations have been robustly tested and support the conclusion that an insufficient quantum of land is available to fulfil Rossendale's housing requirement from these sources. Exceptional circumstances therefore exist to release land from the Green Belt.

**h) Have all opportunities to maximise capacity on non-Green Belt sites been taken, including increasing densities?**

2.15 The yield from individual sites and areas and the consideration of varying densities has been considered as part of the viability work that has been undertaken (EB019, EB020 & EB021) to inform the production of the Plan. Anwyl Land are therefore satisfied that a robust, and importantly realistic and deliverable, approach has been taken in this regard.

**i) Have discussions taken place with neighbouring authorities about whether they could accommodate some of the identified housing need?**

2.16 Anwyl Land have no specific comments to make in response to this question.

**j) What methodology has been applied in the Green Belt Review (2016), and is it soundly based? Does the assessment process give sufficient recognition to the strategic role that some sites play in preventing the unrestricted sprawl of Manchester (purpose 1a and 1b)?**

**Is the framework for assessing harm, based on the existence of one 'strong' score (rather than the number of strong/medium scores), robust and appropriate?**

2.17 Anwyl Land support the approach that has been taken and have no other specific comments to make in response to this question.

**k) How have the conclusions of the Green Belt Review informed the Local Plan? Have decisions on Green Belt release taken account of the need to promote sustainable patterns of development, and given priority to Green Belt sites which are previously developed and/or well served by public transport (in line with the National Planning Policy Framework)? Where is this evidenced?**

2.18 The Green Belt Review (EB022) has been used to inform the selection of appropriate sites for release from the Green Belt. With reference to proposed Housing Allocation H72, Land west of Market Street, Edenfield, the report concludes that parcels 39, 43 and 44 performed weakly in respect of their contribution towards the purpose of including land within the Green Belt and this is one of the primary influences that led to the identification of the site as a Housing Allocation.

2.19 Whilst the outcome of the Green Belt Review is a key influence, it is not the only one. Annex 1 of the Housing Topic Paper clearly states that priority has been given to Green Belt sites which are previously developed. The accessibility of sites has also been a consideration when selecting suitable sites and so Anwyl land are satisfied that a robust approach has been taken.

**l) Do exceptional circumstances exist in principle to alter Green Belt boundaries in Rossendale for housing and employment development? If so, what are they? How many hectares of allocated housing and allocated employment/mixed-use sites are proposed on current Green Belt land?**

2.20 Anwyl Land agree that exceptional circumstances exist to alter Green Belt boundaries in order that housing and employment needs can be met in full. The Green Belt Topic Paper clearly sets out the reasons and due process that has been undertaken to reach this conclusion.

**m) Are the other (non-allocation site) changes to Green Belt boundaries, as set out in document EL1.002d, justified? Have exceptional circumstances been broadly demonstrated?**

2.21 Anwyl Land have no specific comments to make in response to this question.

**n) Is the requirement for development on Green Belt release sites to minimise the impact on openness, as set out in Policy SD2, justified and consistent with national policy?**

2.22 Anwyl Land have no specific comments to make in response to this question.

**o) Is the requirement for development on Green Belt release sites to contribute to compensatory improvements to land elsewhere in the Green Belt, as set out in Policies SD2, justified and deliverable? Does the policy provide sufficient guidance on the scope/form of developer contributions? Would this affect scheme viability? How would off-site improvements be co-ordinated, facilitated and delivered in Rosendale? Does the Council intend to use additional funding sources or delivery methods, and to bring forward an overall strategy?**

2.23 Anwyl Land have no specific comments to make in response to this question.

**p) Did the Council consider whether to designate safeguarded land in the Plan? Should it be identified?**

2.24 Anwyl Land have no specific comments to make in response to this question.

#### **Allocated policies**

**q) Do Policies HS2 and EMP2 provide sufficient clarity regarding the location of the proposed site allocations?**

2.25 Anwyl Land have no specific comments to make in response to this question.

**r) Are the housing density figures in Table 1 in the Plan based on the gross or net site area?**

2.26 Anwyl Land have no specific comments to make in response to this question.

**s) Does the Plan provide sufficient detail on site-specific requirements, constraints and mitigation measures relating to housing, employment and mixed-use allocations in order to effectively guide development? Is it clear what developers are expected to provide and when? Why are detailed site allocation policies only provided for sites H72, H13, H5, M4 and NE4?**

2.27 Anwyl Land have no specific comments to make in response to this question but are satisfied that sufficient clarity is provided in respect of site H72.

**t) Is the proposed Masterplan threshold of 50 dwellings for housing site allocations, as set out in Policy HS2, justified and reasonable?**

2.28 Anwyl Land have no specific comments to make in response to this question.

**u) Are the masterplanning/development brief requirements for employment allocations, as set out in Policy EMP2, adequately defined and justified?**

2.29 Anwyl Land have no specific comments to make in response to this question.

**v) Are the identified B Use Classes on the employment allocations (as set out in Policy EMP2) justified and supported by robust evidence? How does the Council intend to deal with office proposals outside identified centres?**

2.30 Anwyl Land have no specific comments to make in response to this question.

**w) Are the identified Use Classes on the mixed-use allocations (as set out in Policy EMP2) justified and supported by robust evidence? Should Policy EMP2 clarify the proportion of uses on each site and the amount of housing permitted?**

2.31 Anwyl Land have no specific comments to make in response to this question.

**x) What site-specific viability work has been undertaken in support of the proposed site allocations?**

2.32 Anwyl Land have no specific comments to make in response to this question.



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