

Rossendale Local Plan Examination

MATTERS, ISSUES AND QUESTIONS (MIQs)

Hearing Statement of Richard W. Lester

Matter 2 – Vision and spatial strategy

Issue – Does the Plan set out a clear vision, strategic objectives and spatial strategy which present a positive framework that is consistent with national policy and will contribute to the achievement of sustainable development?

[Policy SS Policy SD1 Policy SD2]

2.1 Question a) Does the Plan clearly articulate a vision and strategic priorities for the development use of land in Rossendale, in line with legislation and national policy?

2.2 Response: No, it is not evidence-based and not in line with national policy, for the following reasons.

2.2.1 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** (in so far as SD2 removes 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 that no exceptional circumstances exist and that the Plan is thereby unsound and contrary to the National Planning Policy Framework (February 2019) (NPPF), in particular to paragraphs 136 to 138.

2.2.2 As demonstrated in other hearing statements from Alan Ashworth and me, there is no shortage of sites that requires the Council to release land from Green Belt. The Policies are contrary to NPPF, paragraph 137a. It is irrelevant that the land proposed to be released from the Green Belt would be attractive to developers.

2.2.3 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 (NPPF, paragraph 136) and not because the maker thinks an alternative boundary would be better or no worse.

2.2.4 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 to SD2, any site capable of being masterplanned could be released from Green Belt for development.

2.2.5 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 [it is not defined as such in the Plan]*
- *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.

2.2.6 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).

The explanation is ambivalent as to whether any such SANG or other open space must be in the remaining Green Belt.

2.2.7 Suggested revisions: Delete **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** (in so far as SD2 removes land from Green Belt at H72 Land west of Market Street, Edenfield, NE1 Extension to Mayfield Chicks, Ewood Bridge, NE2 Land north of Hud Hey, Haslingden and NE4 Extension of New Hall Hey, Rawtenstall).

Richard W. Lester

29th August 2019