

Rossendale Local Plan Examination

MATTERS, ISSUES AND QUESTIONS (MIQs)

Hearing Statement of Richard W. Lester

Matter 8 – Approach to site allocations and Green Belt release

Issue – 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?

[Policy HS2 Policy EMP2]

NOTE: I have assisted Mr Alan G. Ashworth in the preparation of his Hearing Statement for Matter 8 and Appendices. I have read these and confirm that I agree with and endorse their content. With a view to avoiding duplication of paperwork, I respectfully request that they be treated as if both Mr Ashworth and I had submitted them separately.

Suggested revisions:

- In Strategic Policy SD2 and Policy HS2 delete reference to H72. Delete Policy HS3.
- In Strategic Policy SD2 and Policy EMP2 delete reference to NE1, NE2 and NE4. Delete Policy EMP7.

Allocation policies

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

Response: No, because RBC documents persistently and falsely state that site H72 includes the adjacent Horse & Jockey site.

8.2. The Pre-Submission Publication Version of the Plan described site H72 Land west of Market Street, Edenfield as ‘Mixed but largely greenfield’: see Table 1: Housing Site Allocations at page 22.

8.3. That description was incorrect. The Council issued a document titled Rossendale Draft Local Plan Pre-Submission Publication Version Errata and dated 3rd September 2018. This reprinted Table 1 so as to describe the H72 land as ‘Greenfield’. That correction has been duly carried forward into the Submission Version of the Local Plan.

8.4. The Council published a Housing Topic Paper dated August 2018. Like the Pre-Submission Publication Version of the Plan it incorrectly described H72 as ‘Mixed but largely greenfield’: see Appendix C at page 26. This contradicted paragraph 3.5.6 of the Topic Paper, which stated at page 13 that the land west of Market Street is greenfield.

8.5. It does not appear that any errata document was issued by the Council for that Topic Paper.

8.6. The Council published another Housing Topic Paper dated March 2019. This missed the opportunity to correct matters. Like the previous Topic Paper and the Pre-Submission Publication Version of the Plan it described H72 as ‘Mixed but largely greenfield’: see Appendix C at page 39. This contradicted paragraph 4.2.11 of the March 2019 Topic Paper, which stated at page 19 that the land west of Market Street is greenfield.

8.7. In both Topic Papers the entry in Appendix C for H72 refers to SHLAA 16358. This is the Horse & Jockey site, currently under development. The Council accepts that this site is not to be treated as part of H72: otherwise it would not have corrected the H72 description to ‘Greenfield’. However, the Policies Map Submission Version continues to show, wrongly, the Horse and Jockey site as part of the H72 land. The Policies Map requires correction urgently.

8.8. It follows also that the reference to SHLAA 16358 in Appendix C to the Housing Topic Paper should be removed, leaving only SHLAA 16256, SHLAA 162672 and SHLAA 16263.

8.9. Appendix C to the Housing Topic Paper and Table 1 in the Submission Version of the Plan show the net developable area of H72 as 15.25 ha with 400 units proposed at a density of 26 dwellings per hectare. The information sheets for assessments for SHLAA 16256, SHLAA 162672 and SHLAA 16263 show net development areas of 2.09, 9.12 and 2.32 ha respectively, totalling 13.53 ha, which would yield 352 units at 26 per hectare.

8.10. Table 1 omits the Horse & Jockey site, where all 10 proposed dwellings were still under construction as at 1st April 2019. It omits other sites as well: **see ECNF - HLA 4.**

8.11. Document *EL1.002e(ii) Site Assessment Overview* at pages 99-102 wrongly states that H72 includes the Horse & Jockey site SHLAA 16358 and wrongly shows it thus on the map.

8.12. *Maps EL1.002c(v), EL1.002e(v) and (viii) and (x) and map EL1.002j(i)* also include the Horse & Jockey site in H72.

8.13. Document *EL1.002j(iii) Housing Trajectory* shows H72's net developable area as 13.74ha, consistent with the total area in its three component SHLAAs. However it then wrongly says 10 dwellings are under construction (these are actually on the Horse & Jockey site) and compounds that error by increasing the density from 26 to 29 dwellings per hectare and changing the estimated delivery from Years 6-15 to 1-15.

8.14. Document *EL1.002j(iv) Status of Allocated Sites* also shows delivery in Years 1-15 and wrongly states "10 dwellings UC on small part".

8.15. The last footnote on page 16 of *EL1.002j(i) Response . . . re Q13 . . .* wrongly states that 10 dwellings are under construction on H72.

8.16. Document *EL1.002b(i) Response . . . re . . . Pre-Hearing Note 1*, paragraph 12.3, Table 2 wrongly shows H72 as including SHLAA 16358 (the Horse & Jockey site).

8.17. That same Table 2 was also deficient in the following respects:

Various sites: no update provided. If there was no known developer interest or recent planning history, it would have been clearer to state this.

H13. Current status of planning application mis-stated.

H24. Not clear whether permission 2015/0261 is extant.

H26. Not clear that Committee approved current application but want a s 106 agreement.

H30. Not clear that Committee approved current application but want a S 106 agreement and that a previous similar application was also approved but withdrawn after s 106 agreement could not be reached.

H33. Revised house types approval omitted.

H36. Not clear whether permission 2015/0030 is extant. Another application last year was withdrawn.

H38, H45 Three more recent applications are omitted.

H54. Should have stated the current position, not that at June 2018.

H65. Should have referred to withdrawal of 2018/0498.

H68. Should have referred to Committee approval in March 2019 and give update on s 106 situation.

8.18. It is regrettable that RBC are so careless in identifying site H72 correctly and important that their errors are clearly shown as such.

Richard W. Lester

29th August 2019