

# Sustainability Appraisal of the Rossendale Borough Local Plan 2019 - 2034

## Addendum to the Regulation 19 SA/ SEA Report

March 2019



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



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# About this report & notes for the reader

Lepus Consulting Ltd (Lepus) has prepared this report for the use of Rossendale Borough Council. This document is intended as an Addendum to the Regulation 19 SA/SEA Report, which is available on the Rossendale Borough Council website.

There are a number of limitations which should be borne in mind when considering the results and conclusions of this report. No party should alter or change this report without written permission from Lepus.

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SEA and SA are tools for predicting potential significant effects. The actual effects may be different from those identified. Prediction of effects if made using an evidence-based approach and incorporates a judgement as well as the precautionary principle.

Assessments are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. No attempt to verify secondary data sources have been made and they are assumed to be accurate as published.

Many effects will depend on the size and location of development, building design, construction, proximity to sensitive receptors such as biodiversity sites, flood risk areas and landscapes and the range of uses that takes place. The report was prepared during February and March 2019 and is subject to, and limited by, the information available during this time.

The report has been produced to assess the sustainability effects of the Local Plan. It is not intended to be a substitute for Environmental Impact Assessment or Habitat Regulations Assessment.

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# 1 Introduction

## 1.1 Context

1.1.1 The purpose of this document is to support Rossendale Borough Council (RBC) in the preparation of their Local Plan 2019 - 2034.

1.1.2 In 2018, RBC underwent public consultation on the Pre-Submission Publication Version of the Rossendale Local Plan (Regulation 19)<sup>1</sup>. This version of the Plan was supported by a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) report<sup>2</sup>, which satisfied the requirements of an ‘Environmental Report’ as per the SEA Directive<sup>3</sup> (from here on referred to as the Regulation 19 SA Report).

1.1.3 This document constitutes an addendum to the Regulation 19 SA Report in order to address responses related to the SA/SEA received by Rossendale during the Regulation 19 consultation.

## 1.2 Using this document

1.2.1 This document should be read in the context of the SA and Local Plan process so far (see **Table 2.1**) and in conjunction with the Regulation 19 SA Report.

1.2.2 **Chapter 2** will address and respond to matters raised during consultation which are related to the SA/SEA. **Chapter 3** provides additional commentary about site selection process using the SA. **Chapter 4** assesses Policy SS of the Rossendale Draft Local Plan.

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<sup>1</sup> Details available on the Rossendale Borough Council website, Emerging Local Plan. Available at:

[https://www.rossendale.gov.uk/info/210148/local\\_plan/10629/emerging\\_local\\_plan/2](https://www.rossendale.gov.uk/info/210148/local_plan/10629/emerging_local_plan/2)

<sup>2</sup> Lepus Consulting (2018) Sustainability Appraisal and Strategic Environmental Assessment of the Rossendale Borough Council Local Plan.

Available at:

[https://www.rossendale.gov.uk/downloads/file/14469/sustainability\\_appraisal\\_of\\_the\\_publication\\_version\\_of\\_the\\_local\\_plan](https://www.rossendale.gov.uk/downloads/file/14469/sustainability_appraisal_of_the_publication_version_of_the_local_plan)

<sup>3</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32001L0042>

## 2 Consultation Responses

### 2.1 Background

2.1.1 Consultation on the Pre-Submission Publication Version of the Rossendale Local Plan closed on 5<sup>th</sup> October 2018<sup>4</sup>. During consultation, RBC received several comments in relation to the Sustainability Appraisal process.

### 2.2 SA documents

2.2.1 The SA process has followed the Local Plan making process on an iterative basis. Consequently, there are several SA documents that have been prepared. The Regulation 19 SA Report meets the requirements of the SEA Directive and all earlier work is clearly referenced in the Regulation 19 SA Report and is available on the RBC website. **Table 2.1** sets out the iterative timeline of the Local Plan and SA/SEA processes.

*Table 2.1: Timeline of SA documents in relation to the Rossendale Local Plan process.*

Date	Local Plan stage	Date	Sustainability Appraisal stage & report
July – October 2017	Rossendale Draft Local Plan Regulation 18 Consultation	May 2017	Sustainability Appraisal of the Rossendale Draft Local Plan Regulation 18 Consultation
August – October 2018	Pre-Submission Publication Version Regulation 19 Consultation	August 2018	Sustainability Appraisal of the Rossendale Local Plan

<sup>4</sup> Rossendale Borough Council (2019) Consultation on the Pre-Submission Publication Version of the Local Plan (Regulation 19). Available at: [https://www.rossendale.gov.uk/info/210148/local\\_plan/10629/emerging\\_local\\_plan/2](https://www.rossendale.gov.uk/info/210148/local_plan/10629/emerging_local_plan/2)

## 2.3 Representations at R19

2.3.1 Various representations were received that raised issues associated with the SA process and findings. These are summarised in **Appendix A**. Collectively, they related to:

- Site M4, Futures Park;
- Employment floorspace;
- The numbering of the site assessments;
- Historic assets in Edenfield; and
- Spatial options.

2.3.2 The following sections address each of these matters.

## 2.4 Futures Park

### August 2018 Regulation 19

2.4.1 This site was previously assessed in the SA Regulation 19 Report as a mixed-use site, for residential development and employment floorspace (**Table 2.2**).

**Table 2.2:** Assessment of site M4, Futures Park, presented in the August 2018 SA Regulation 19 Report.

M4: Futures Park (Residential & Employment)	
1: Landscape	Minor adverse impacts L4 and L5.
2: Cultural Heritage	Minor adverse impact CH3.
3: Biodiversity & Geodiversity	Minor adverse impact BG4.
4: Water & Flooding	Coincides with Flood Zone 3. The 2016 SFRA assessed this site when it was smaller. The site is now larger and there is likely space within the site perimeter to direct development away from Flood Zone 3. SWFR 1/30 is also present within the site (minor adverse impact 2).
5: Natural Resources	Minor adverse impact NR1.
6: Climate Change Mitigation	Minor adverse impact CCM1.
7: Climate Change Adaptation	Minor adverse impact CCA1.
8: Health	Minor adverse impact H1.
9: Material Assets	Minor adverse impact MA1.
10: Housing	Minor net increase in housing.
11: Employment (location)	Net increase in local employment opportunities due to site proposal.
12: Employment (skills)	Within the target distance of primary schools.
13: Transport	Good access to bus services and PRoW.

## Regulation 19 Addendum

- 2.4.2 The following assessment of site M4 considers the site for mixed-use, which includes residential development, employment floorspace and transit use for Gypsies and Travellers (**Table 2.3**).

**Table 2.3:** Assessment of site M4, Futures Park, as a mixed-use site for residential development, employment floorspace and a transit site for Gypsies and Travellers.

M4: Futures Park (Residential, Employment & Gypsy and Traveller)	
1: Landscape	Minor adverse impacts L4 and L5.
2: Cultural Heritage	Minor adverse impact CH3.
3: Biodiversity & Geodiversity	Minor adverse impact BG4.
4: Water & Flooding	Major adverse impact WF1. Minor adverse impact WF2.
5: Natural Resources	Minor adverse impact NR1.
6: Climate Change Mitigation	Minor adverse impact CCM1.
7: Climate Change Adaptation	Minor adverse impact CCA1.
8: Health	Minor adverse impact H1.
9: Material Assets	Minor adverse impact MA1.
10: Housing	Net increase in housing. Net increase in Gypsy and Traveller pitches/plots.
11: Employment (location)	Net increase in local employment opportunities due to site proposal.
12: Employment (skills)	Within the target distance of primary schools.
13: Transport	Good access to bus services and PRoW.

- 2.4.3 The addition of transit use for Gypsies and Travellers at site M4 would not be expected to alter the sustainability performance identified for the site in the August 2018 SA Regulation 19 Report. The paragraphs below expand on Table 2 and provides explanations for the likely adverse impacts identified.
- 2.4.4 **SA Objective 1:** Development at site M4 could potentially alter the views experienced by residents at Lee Road and Flag Street, as well as residents situated along the A681. The proposed development could potentially constitute a minor extension of the urban built form into the countryside and as a result, alter the local landscape character.
- 2.4.5 **SA Objective 2:** Site M4 is located in close proximity to the Grade II Listed Building
- 2.4.6 ‘Gate Arch to Garden of Rockcliffe House’. Development at the site could potentially alter the setting of this Grade II Listed Building.

- 2.4.7 **SA Objective 3:** The site is located approximately 280m from Lee Quarry Site of Special Scientific Interest (SSSI), Biological Heritage Site and Local Geological Site. Although located in close proximity, Lee Quarry is designated for its geological features and it is unlikely that the proposed development at this location would impact the integrity of the SSSI.
- 2.4.8 **SA Objective 4:** A proportion of the site is located within Flood Zone 3. The site also coincides with areas at high risk of surface water flooding. Development at this site could potentially locate new residents in areas at risk of flooding and therefore poses a health risk.
- 2.4.9 **SA Objectives 5 and 7:** The site is primarily previously undeveloped land, located on Grade 4 Agricultural Land Class soils. The proposed development would be expected to result in the loss of greenfield land, as a proportion of the Plan area, this increase would be expected to be less than 0.1%
- 2.4.10 **SA Objective 6:** The proposed development would be likely to increase greenhouse gas emissions in the local area in relation to existing levels. As a proportion of the Plan area's annual carbon footprint, this increase would be expected to be less than 1%. This is primarily in relation to the construction and occupation of new dwellings, as well as the consumption of natural resources and energy that is inherent to this process.
- 2.4.11 **SA Objective 8:** The site is located just over 5km from the Royal Infirmary NHS Hospital, as well as half of the site located over 800m from the nearest GP surgery, Irwell Medical Practice. The site is located over 1.5km from Whitworth Leisure Centre. New residents to the site would be expected to have limited access to these healthcare facilities. However, the site is not within close proximity to an AQMA and is in close proximity to public greenspace, providing site users access to a range of natural habitats, which is known to have physical and mental health benefits.
- 2.4.12 **SA Objective 9:** The site proposal could potentially lead to an increase in waste generation, as a proportion of the Plan area's total waste generation, by under 1%.
- 2.4.13 **SA Objective 10:** The proposed development at site M4 would be likely to result in an increase in dwellings across the Plan area, as well as an increase in pitch and plot provision for Gypsies and Travellers.

- 2.4.14            **SA Objective 11:** The site is located less than 5km away from the centre of Bacup, where new site users would be expected to have good access to a range of employment opportunities. The site is proposed for the development of employment floorspace and as such would be likely to result in a net gain of employment land across the Plan area.
- 2.4.15            **SA Objective 12:** The site is located within 800m of both St Joseph's Roman Catholic Primary School and St Saviour's Community Primary School. However, the site is located over 1.5km from Fearn's Community Sports College and Bacup & Rawtenstall Grammar School to the west of the site.
- 2.4.16            **SA Objective 13:** The site is located over 2km from the nearest railway station, Walsden Railway Station. However, the site is located adjacent to two bus stops located to the north west (on the A681) and north east (on the A6066). A public footpath is also located adjacent to the site, to the north west.

## 2.5                **Employment floorspace**

- 2.5.1            Appendix D, page D2, paragraph 1.1.3 states *“The Employment Land Review of the Borough identified a range of 22ha - 32ha in the overall need of employment land for Rossendale, ranging from 22ha to 32ha. In line with Policy EMP1 in the Local Plan, RBC therefore consider there to be a need for 27ha of employment land over the Plan period”*.
- 2.5.2            Policy EMP1 states *“The Council, together with developers and other partners, will seek to provide sufficient employment land to meet the Borough's requirement of 27 hectares for business, general industrial or storage and distribution (Use Classes B1, B2 and B8) for the period up to 2034”*.

2.5.3 The justification of this is: “*The Employment Land Review (ELR) considered a number of scenarios in order to identify the Borough’s Objectively Assessed Need for Employment, ranging from 22ha to 32ha over the period 2014 to 2034. The lower figure is based on past delivery of employment land, which has been low and it could be considered that this under supply has been constraining Rossendale’s economic growth. Hence the Council is proposing a mid-way employment land requirement of 27ha, which aligns with Housing Need (based on a labour supply of 220 dwellings per annum (dpa) and taking into account an allowance for the replacement of losses (of 26.9ha) and factoring in a flexibility margin of two years take-up of 1.99ha)*”.

## 2.6 Numbering of site assessments

2.6.1 **Table 2.4** below corrects the Site Reference number in the SA Regulation 19 Report.

*Table 2.4: Alteration of Site Reference codes.*

Site References in the SA Regulation 19 Report	Site References in the Rossendale Local Plan
H1: Greenbridge Mill (Hall Carr Mill) Lambert Haworth	H1: Greenbridge Mill (Hall Carr Mill) Lambert Haworth
H2: Magistrates Court, Rawtenstall	H2: Magistrates Court, Rawtenstall
H3: Land at Former Oakenhead Resource Centre	H3: Land at Former Oakenhead Resource Centre
H4: Turton Hollow	H4: Turton Hollow
H5: Swinshaw Hall Loveclough	H5: Swinshaw Hall Loveclough
H6: Land South for 1293 Burnley Road, Loveclough	H6: Land South for 1293 Burnley Road, Loveclough
H7: Land Adjacent Laburnum Cottages	H7: Land Adjacent Laburnum Cottages
H8: Oak Mount Garden	H8: Oak Mount Garden
H10: Land off Oaklands and Lower Cribden Avenue	H9: Land off Oaklands and Lower Cribden Avenue
H11: Land at Bury Road, Rawtenstall	H10: Land at Bury Road, Rawtenstall
H12: The Hollins, Hollin Way	H11: The Hollins, Hollin Way
H13: Reedsholme Works, Rawtenstall	H12: Reedsholme Works, Rawtenstall
H14: Loveclough Working Mens club	H13: Loveclough Working Mens club
H15: Hall Carr Farm	H14: Hall Carr Farm
H16: Willow Avenue off Lime Tree Grove	H15: Willow Avenue off Lime Tree Grove
H17: Land East of Acrefield Drive (Hollin Way)	H16: Land East of Acrefield Drive (Hollin Way)

Site References in the SA Regulation 19 Report	Site References in the Rossendale Local Plan
H18: Land South of Goodshaw Fold Road, Loveclough	H17: Land South of Goodshaw Fold Road, Loveclough
H19: Carr Farm, Lomas Lane	H18: Carr Farm, Lomas Lane
H20: Land off Lower Clowes Road	H19: Land off Lower Clowes Road
H21: Old Market Hall	H20: Old Market Hall
H22: Reed Street, Bacup	H21: Reed Street, Bacup
H23: Former Bacup Health Centre	H22: Former Bacup Health Centre
H24: Glen Mill	H23: Glen Mill
H25: The Former Commercial Hotel	H24: The Former Commercial Hotel
H26: Land at Blackwood Road, Stacksteads	H25: Land at Blackwood Road, Stacksteads
H27: Land off Greensnook Lane	H26: Land off Greensnook Lane
H28: Off Fernhill Drive	H27: Off Fernhill Drive
H29: Sheephouse Reservoir, Britannia	H28: Sheephouse Reservoir, Britannia
H30: Land off Pennine Road, Bacup	H29: Land off Pennine Road, Bacup
H31: Tong Farm	H30: Tong Farm
H32: Lower Stack Farm	H31: Lower Stack Farm
H33: Booth Road/Woodland Mount, Brandwood	H32: Booth Road/Woodland Mount, Brandwood
H34: Land off Rockcliffe Road	H33: Land off Rockcliffe Road
H35: Land at Higher Cross Row	H34: Land at Higher Cross Row
H36: Shadlock Skip	H35: Shadlock Skip
H37: Hare and Hounds Garage	H36: Hare and Hounds Garage
H38: Land off Gladstone Street	H37: Land off Gladstone Street
H39: Land off Burnley Road and Meadows Avenue	H38: Land off Burnley Road and Meadows Avenue
H40: Land off Cowtoot Lane	H39: Land off Cowtoot Lane
H41: Land off Todmorden Road, Bacup	H40: Land off Todmorden Road, Bacup
H42: Thorn Bank	H41: Thorn Bank
H43: Land south of the Weir Public House	H42: Land south of the Weir Public House
H44: Land west of Burnley Road, Weir	H43: Land west of Burnley Road, Weir
H45: Irwell Springs, Weir	H44: Irwell Springs, Weir
H46: Former Haslingden Police Station	H45: Former Haslingden Police Station
H47: 1 Laburnum Street	H46: 1 Laburnum Street
H48: Land at Kirkhill Avenue, Halsingden	H47: Land at Kirkhill Avenue, Halsingden
H49: Land off Highfield Street	H48: Land off Highfield Street

Site References in the SA Regulation 19 Report	Site References in the Rossendale Local Plan
H50: Land adjacent 53 Grane Road	H49: Land adjacent 53 Grane Road
H51: Land Adjacent Park Avenue/Cricceth Close	H50: Land Adjacent Park Avenue/Cricceth Close
H52: Land To Side And Rear Of Petrol Station, Manchester Rd	H51: Land To Side And Rear Of Petrol Station, Manchester Rd
H54: Land Rear Of Haslingden Cricket Club	H52: Land Rear Of Haslingden Cricket Club
H55: Waterfoot Primary School	H53: Waterfoot Primary School
H56: Land at Ashworth Road, Water	H54: Land at Ashworth Road, Water
H57: Carr Mill and Bolton Mill	H55: Carr Mill and Bolton Mill
H58: Knott Mill works, Pilling Street and Orchard Works, Miller Barn Lane	H56: Knott Mill works, Pilling Street and Orchard Works, Miller Barn Lane
H59: Foxhill Drive	H57: Foxhill Drive
H60: Land off Lea Bank	H58: Land off Lea Bank
H61: Land Adjacent Dark Lane Football ground	H59: Land Adjacent Dark Lane Football ground
H62: Johnny Barn Farm, Cloughfold	H60: Johnny Barn Farm, Cloughfold
H63: Hareholme	H61: Hareholme
H64: Land off Peel Street, Cloughfold	H62: Land off Peel Street, Cloughfold
H65: Hollin Farm, Waterfoot	H63: Hollin Farm, Waterfoot
H66: Hargreaves Fold Lane, Chapel Bridge, Lumb	H64: Hargreaves Fold Lane, Chapel Bridge, Lumb
H67: Albert Mill, Whitworth	H65: Albert Mill, Whitworth
H68: Barlow Bottom (east of river)	H66: Barlow Bottom (east of river)
H69: Land behind Buxton Street	H67: Land behind Buxton Street
H70: Former Spring Mill (land off eastgate and westgate)	H68: Former Spring Mill (land off eastgate and westgate)
H71: Cowm water treatment works, Whitworth	H69: Cowm water treatment works, Whitworth
H72: Irwell Vale Mill	H70: Irwell Vale Mill
H73: Land east of Market Street, Edenfield	H71: Land east of Market Street, Edenfield
H74: Land west of Market Street	H72: Land west of Market Street
H75: Edenwood Mill	H73: Edenwood Mill
H76: Grane Village	H74: Grane Village

## 2.7 Historic assets in Edenfield

- 2.7.1 The SA does not assume future masterplans will address and mitigate any negative impacts on heritage assets. **Paragraph 1.4.2** of the SA Regulation 19 Report states: *“impacts on heritage assets will be largely determined by the specific layout and design of development proposals. These are currently unknown and therefore the likelihood, extent and permanence of effects on heritage assets is somewhat uncertain at this stage. In line with the precautionary principle, where adverse impacts cannot be ruled out and where there is no evidence that shows how the potential adverse effects will not arise, the adverse effects are assumed to occur. This is reflected in the scoring for each Plan proposal”*.
- 2.7.2 Edenfield Parish Church and other heritage assets within Edenfield are assessed in the Sustainability Appraisal of the Rossendale Local Plan: Reasonable Alternatives, in **section 3.6**. Not every heritage asset within the Plan area can be mentioned and assessed as part of the SA process.

## 2.8 Spatial Options

- 2.8.1 To help inform the direction of the plan making, a series of spatial options (A-D) were prepared for the Rossendale Local Plan (RLP) by the Council. These were prepared on the basis that they provided options around which plan making could be informed as the plan evolved. They are high level and the SA findings are similar for each option, despite the difference in housing numbers. **Section 2.4.5** of the SA concludes that *“Overall, Option D was considered to be the best performing option”*.
- 2.8.2 This conclusion was made for two reasons. The first was the need to meet the target housing number. The second reason concerned the spatial flexibility of Option D.
- 2.8.3 Accepting that the need to meet the housing number was an important and objective aspect of the SA scoring, the main difference between Option A and D is the fact that Option D performs better since it meets the housing number (3,180).

- 2.8.4 In terms of spatial flexibility, the SA Report records that “*Option D combines some of the key elements of Options A, B and C. There is considered to be greater scope for avoiding and mitigating adverse sustainability impacts under Option D because of the proposed quanta and distribution of development. As such, it is likely that the adverse impacts currently anticipated under a worst-case scenario for Option D will be less severe and in some cases avoided. Option D would deliver development which satisfies the local OAN and overall is considered to be the best performing spatial option*”.
- 2.8.5 The spatial strategy and housing number proposed in the Local Plan is different to any of the previous spatial options. It has a fixed Housing Number of 3,180 and includes spatial dimensions that feature to some extent in all of the original four options. As such, there is a new ‘option’, the preferred option (Policy SS in the RLP).
- 2.8.6 The Council has confirmed that whilst aspiring to the principles of Option D in designing their preferred option, the estimated figures provided at the time of the preparation of the spatial options were based on land supply. During the selection of the most suitable sites for development, certain sites were not brought forward due to a variety of constraints and therefore the housing figure in the emerging Local Plan is smaller than the figure originally anticipated in Option D.
- 2.8.7 Spatially, the preferred option in the Local Plan and Option D are similar. In terms of SA performance, the assessment of the Spatial Strategy is presented in **Chapter 4**. This confirms that the preferred option performs similarly to Option D.
- 2.8.8 As a general principle, it should be born in mind that the SA of high-level spatial options is necessarily restricted as explained in the text of the Regulation 19 SA Report.
- 2.8.9 **Section 2.4.3** of the SA Report states that “*Many of the adverse impacts identified during the appraisal of spatial options are ‘worst-case scenarios’. This means major or minor adverse impacts cannot be ruled out based on the currently available information and, in accordance with the precautionary principle, are assumed to occur*”.

2.8.10 The application of the SA as a singular deterministic tool is therefore restricted at this scale of assessment. The Spatial Options perform similarly for this reason.

## 2.9 Corrections

2.9.1 Option A contains a typographic error in that the scoring box indicates a minor positive impact whereas the text records the fact that it should be minor negative.

2.9.2 Option D was identified as the best performing option since it met the housing need number which as the time of appraisal was initially higher and was later reduced to 3,180. Although Option D exceeded the housing number considerably, this Option presents a spatial strategy which performs well in terms of sustainability.

## 3 Site selection process

3.1.1 **Table 3.1** below list of the reasons for rejection of sites through the development of the Local Plan. This table has been prepared by Rossendale Borough Council.

*Table 3.1: A summary of the site selection process carried out by Rossendale Borough Council.*

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Acre Meadow	SHLAA16269	Performs poorly against water and less than average on 4 others.	N/A	Northern half of the site available. Steep slopes to the east. Eden Lane would require improvements to sustain increased traffic. Woodland Stepping Stone Habitat.	N/A	N/A
Albert Mill	N/A	Performs poorly on water and less than average on 4 criteria.	HS2.105	N/A	H65: Albert Mill, Whitworth	N/A
Anvil Street	SHLAA16082	4 less than average criteria.	HS2.5	N/A	N/A	No support from landowner, wants to retain in employment.
Area of search to the east of Edenfield	SHLAA16260	Performs poorly against landscape and less than average on 4 criteria.	HS2.74	Woodland Stepping Stone and various ecological corridors. Green Belt Parcels 37, 40 and 41 to be retained.	N/A	N/A
Bacup Road Coal Yard (E)	N/A	N/A	EMP2.56	N/A	EE45: Bacup Coal Yard	Site is in use, no indication from the landowner.
Barlow Bottom (E)	N/A	N/A	N/A	N/A	M6: Barlow Bottoms, Facit	Had been identified as Gypsy and Transit site but this was relocated to Futures

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
						Park. Site no longer allocated.
Barlow Bottom (to the East of the River Spodden)	N/A	N/A	N/A	N/A	H66: Barlow Bottom (east of river)	Site is being developed as a Care Home.
Blackwood Road (A) (G&T)	SHLAA16109	2 criteria perform badly (climate change/transport) and less than average on 4 criteria.	HS2.24	N/A	H25: Land at Blackwood Road, Stacksteads	Alternative site identified with better access for Gypsy and Traveller Transit site.
Blackwood Road (B) (G&T)	N/A	N/A	HS2.24	N/A	H25: Land at Blackwood Road, Stacksteads	Alternative site identified with better access.
Booth Road/Woodland Mount	SHLAA16098	2 criteria less than average.	HS2.28	N/A	H32: Booth Road/Woodland Mount, Brandwood	N/A
Broad location to the north east of Shawforth	SHLAA16378	Performs poorly against climate change and less than average against 5 criteria.	N/A	Green Belt study states it plays an essential role in separating Bacup and Shawforth. Some contamination issues. Steep slopes. No GP surgery within 1.5 miles. Coal resources close to the surface.	N/A	N/A
Buckhurst Plant/ Warth Mill plus land at rear (E)	N/A	N/A	EMP2.54	N/A	EE43	Amenity issues due to proximity of employment uses.
Caravan Storage Site by A56	SHLAA16259	N/A	N/A	Isolated site in Green Belt.	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Carr Farm, Lomas Lane	SHLAA16383	Poor against transport and landscape; 4 other poor criteria.	H2.67	N/A	H18: Carr Farm, Lomas Lane	N/A
Clod Lane (north)	SHLAA16282	2 double negative and 6 less than average criteria.	N/A	Green Belt study - to be retained (Parcel 23).	N/A	N/A
Clod Lane (south)	SHLAA16283	2 double negative and 6 less than average criteria.	N/A	Woodland Stepping Stone Habitat, Green Belt, underlying geology, not near services. Parcel 23 to be retained.	N/A	N/A
Constable Lee Court	N/A	N/A	n/a	Got planning consent for residential development.	N/A	N/A
Cown Water Treatment Works	SHLAA16016	Performs poorly against Climate change, employment and transport and less than average on 4 other criteria.	HS2.108	N/A	H69: Cowm water treatment works, Whitworth	N/A
Cowtoot Lane	SHLAA16067	Performs poorly against Landscape and less than average on 6 criteria.	HS2.7	N/A	H39: Land off Cowtoot Lane	N/A
East Parade	N/A	N/A	N/A	Got planning permission - 2012/0210.	N/A	N/A
Eastgate / Spring Mill	SHLAA16005	Performs poorly against water and climate change and less than average on 2 criteria.	HS2.107	N/A	H68: Former Spring Mill (land off eastgate and westgate)	N/A
Edenwood Mill	N/A	Performs poorly on water and climate change and less than average on 5 criteria.	HS2.73	N/A	H73: Edenwood Mill	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
End of Haslingden Sports Centre Playing Field	SHLAA16299	Performs well.	N/A	Covenant on the land.	N/A	N/A
Extension of New Hall Hey to the west	N/A	N/A	EMP2.26	N/A	NE4: Extension of New Hall Hey	N/A
Field adj Goodshaw Lane/ Gibhill Lane	SHLAA16201	Performs poorly against climate change and less than average against 6 criteria.	N/A	Gradient present. Access will require improvements. Flood risk in small part of the site. Complex ownership.	N/A	N/A
Former Bacup Heath Centre	Site has planning consent	Performs poorly for loss of employment and 3 other criteria are less than average.	HS2.19	N/A	H22: Former Bacup Health Centre	N/A
Former Bacup Leisure Centre	SHLAA16068	Performs poorly against 4 criteria.	N/A	Alternative use to housing being proposed.	N/A	N/A
Former Broadleys Mill (north)	SHLAA16190	Performs poorly on climate change and loss of employment; two others less than average.	HS2.43	N/A	H12: Reedsholme Works, Rawtenstall	N/A
Land behind Myrtle Grove Mill (former isolation hospital), Waterfoot	SHLAA16164	Performs poorly on climate change and less than average on 4 other criteria.	HS2.84	N/A	N/A	Landowner intentions unknown. 2 resident objections. Access issues.
Former Rossendale and Accrington College site (E)	N/A	N/A	N/A	Site brought forward for alternative use.	N/A	N/A
Foxhill Drive	N/A	Performs less than average on 3 criteria.	HS2.94	N/A	H57: Foxhill Drive	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Future Park	N/A	N/A	N/A	N/A	M4: Futures Park	N/A
Gaghill's Building Lane	SHLAA16129	Performs poorly against 2 criteria (water and employment) and less than average on 3 others.	N/A	Flood zone 3 and high risk of surface water flooding.	N/A	N/A
Garage Colony off Turnpike	SHLAA16136	Performs poorly against biodiversity & climate change and less than average on 3 other criteria.	N/A	Trickett's Memorial Ground, Woodland identified as Stepping Stone Habitat.	N/A	N/A
Green Farm	SHLAA16052	Performs less than average against 6 criteria.	HS2.6	N/A	H40: Land off Todmorden Road	N/A
Hardman Avenue (Hall Carr Farm)	SHLAA16383	N/A	HS2.67	N/A	H14: Hall Carr Farm	N/A
Haslam Farm	SHLAA16248	Performs poorly against landscape/climate change & less than average against 5 criteria.	HS2.60	N/A	N/A	Presence of infrastructure limiting developable area to justify GB release Stepping stone habitat. Landowner wants extension to south. Re-assessment of Green Belt releases following draft rNPPF.
Hazel Street, Rising Bridge	SHLAA16351	Performs poorly on climate change adaptation.	N/A	Grassland stepping stone habitat, Steep access off Hazel Street. TPO covering the site. Potential high landscape impact.	N/A	N/A
Heathbourne Road	SHLAA16099	Performs less than average on three criteria.	N/A	The site is too small to deliver 5 or more dwellings.	N/A	N/A
Height Barn Lane	SHLAA16375	Only two criteria are less than average.	N/A	Slope present. Access is via a narrow track and poor	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
				visibility splays onto New Line. No good access to bus service.		
Hobson Street Plateau	SHLAA16223	N/A	N/A	N/A	N/A	N/A
Hollin Gate Farm, Rising Bridge	SHLAA16349	Performs poorly on climate change adaptation and less than average on 5 other criteria.	EMP2.38	Intentions of the landowner unknown. Reduce Green Belt releases.	N/A	N/A
Holme Works, Holme Lane (E)	SHLAA16280	N/A	HS2.39	N/A	N/A	Re-assessment of Green Belt releases following draft rNPPF.
Horncliffe Quarry	SHLAA16247	Performs poorly on climate change adaptation and less than average on 6 criteria.	N/A	Intentions of the landowners unknown. No bus service within 400m. No shop within 1 mile. Ecological values. Land contamination (landfill).	N/A	N/A
Horse and Jockey PH	N/A	Only 2 less than average criteria.	HS2.71	N/A	H72	N/A
Hugh Mill, Cowpe	SHLAA16114	4 criteria perform less than average.	N/A	Access would require improvements to support a large housing development. Surface water flood risk. Potential land contamination.	N/A	N/A
Johnny Barn 2	SHLAA16171	N/A	HS2.53	N/A	N/A	Boundary change to reduce site area.
Johnny Barn Farm	SHLAA16171	Less than average on 4 criteria.	HS2.53	N/A	H60: Johnny Barn Farm, Cloughfold	N/A
Kirk Hill Rise (C)	SHLAA16318	Performs poorly in terms of climate change criteria and	N/A	Gradient. Vehicular access requires improvement. Wetland and Heath Stepping	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
		less than average on 6 other criteria.		Stone habitat. Parcel 14 to be retained in Green Belt.		
Land adj Park Avenue/Cricceth Close	SHLAA16308	N/A	HS2.37	N/A	H50: Land Adjacent Park Avenue/Cricceth Close	N/A
Land adj St Anne's School	N/A	Less than average on 3 criteria.	N/A	Steep, poor access, possible other uses sought.	N/A	N/A
Land adj Ullswater Way	SHLAA16198	Performs poorly against Climate Change and less than average against 7 other criteria.	N/A	Adjoins a Listed Building (Grade II*). A small part of the site is within the Coal Authority high risk development area. Multiple ownerships.	N/A	N/A
Land adj Waterbarn Chapel, Rakehead Lane	SHLAA16105	Performs poorly against 2 criteria (Water & Climate Change) and less than average on 3 criteria.	N/A	Flood risk. Former cricket ground, which should be retained to address wider deficit. Listed Building present on site.	N/A	N/A
Land adjacent Dark Lane	SHLAA16159	Performs less than average on 2 criteria.	HS2.82	N/A	H59: Land Adjacent Dark Lane Football ground	N/A
Land adj Goodshaw Bowling Green	SHLAA16203	4 criteria less than average.	HS2.47	N/A	H5: Swinshaw Hall Loveclough	N/A
Land adj Laburnum Cottage	SHLAA16197	Only 2 criteria less than average.	HS2.51	N/A	H7: Land Adjacent Laburnum Cottages	N/A
Land Adj Maden Recreational	SHLAA16325	Only two less than average criteria.	HS2.34	Access issues.	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Centre (to rear of Highfield)						
Land adj to Baxenden Chemicals	N/A	N/A	N/A	N/A	NE5: Baxenden Chemicals Ltd, Rising Bridge	N/A
Land adj to Baxenden Chemicals (G&T)	N/A	N/A	N/A	Land required by owners to expand their business and therefore, no longer available.	N/A	N/A
Land adjacent Swiss Clough	SHLAA16131	Performs poorly against biodiversity and less than average against 3 other criteria.	N/A	Woodland and allotment gardens. Vehicular access issues. Surface water flood risk.	N/A	N/A
Land around Sheephouses Reservoir	SHLAA16041	7 criteria perform less than average.	N/A	Covenants associated with the land title. Presence of a slope. Very prominent in landscape. Relatively isolated from local services and Tong lane is a narrow access lane.	N/A	N/A
Land at Alder Bottom / Great Hey Clough	SHLAA16274	Poor on landscape, biodiversity and climate change and less than average against 2 criteria	N/A	Intentions of the landowners unknown. Poor access via a single narrow lane. No bus service within half a mile and no GP surgery within 1,5 miles. 5% of the site within a Biological Heritage Site. Possible land contamination.	N/A	N/A
Land at Chatterton Hey East of A56	SHLAA16272	N/A	N/A	Parcel 46 to be retained in the Green Belt.	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Land at Cloughfold	N/A	Performs poorly on climate change and less than average on 4 criteria.	HS2.54	N/A	N/A	Biodiversity. Potential land instability. Woodland. Covenant attached to the land.
Land at Douglas Road/ Fieldfare Way	SHLAA16399	N/A	HS2.16	Too small to deliver 5 or more dwellings. However, would provide access to site HS2.16.	H29: Land off Pennine Road, Bacup	N/A
Land at Hey Head	SHLAA16133	Less than average on 3 criteria.	N/A	Steep slopes. Surface water flood risk. Wooded area.	N/A	N/A
Land at Higher Cross Row	SHLAA16065	N/A	HS2.3	N/A	H34: Land at Higher Cross Row	N/A
Land at Hollin Bank, Helmshore	SHLAA16380	Performs poorly on 3 criteria-landscape, water and climate change.	N/A	Some land (e.g. Allotments and existing buildings) can be released from Green Belt other constraints exist, such as difficult access issue via Hollin Lane.	N/A	N/A
Land at Hollin Lane, Rawtenstall	SHLAA16184	Transport performs poorly and 4 less than average.	HS2.44	N/A	N/A	Access issue via Hollin Lane which is a narrow single lane with no possibility of widening.
Land at Market Street	SHLAA16096	N/A	N/A	N/A	N/A	N/A
Land at Moss Farm	SHLAA16096	4 criteria perform badly (landscape/water/climate change and transport) with 4 others less than average.	N/A	Not all landowners are willing.	N/A	N/A
Land at Rossendale Crescent -	SHLAA16055	1 criterion performed poorly and 3 were less than average.	N/A	Informal recreation area. Potential land contamination. Partly located in a high-risk development area.	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Greave Clough Lane						
Laund Bank Barn 2	SHLAA16221	Performs less than average on 4 criteria.	N/A	Site partly in a Biological Heritage Site. A quarter of the site is within the Coal Authority high risk development area.	N/A	Site partly in a Biological Heritage Site. A quarter of the site is within the Coal Authority high risk development area.
Land behind Buxton Street	SHLAA16021	Performs poorly on climate change and less than average on 4 other criteria.	HS2.103	N/A	H67: Land behind Buxton Street	N/A
Land behind Pennine Road to the East	SHLAA16043	Less than average on 3 criteria.	HS2.16	N/A	N/A	N/A
Land East of Acrefield Drive, Reedsholme	SHLAA16043	Performs poorly on transport and less than average on 4 criteria.	HS2.46	N/A	H16: Land East of Acrefield Drive (Hollin Way)	N/A
Land east of Goodshaw Lane	SHLAA16196	Less than average against 6 criteria.	Do not allocate for housing	Close to Listed church. Goodshaw Lane relatively narrow. Limited capacity at school.	N/A	Performs poorly on 3 criteria (water, natural resources and climate change adaptation).
Land east of Holcombe Road	SHLAA16301	Performs poorly on 3 criteria (water, natural resources and climate change adaptation).	Do not allocate for housing	Landowner not supportive. Flood zone 3 and 2. Woodland and Grassland Stepping Stone Habitat. Potential high landscape impact.	N/A	N/A
Land East of Rochdale Road	SHLAA16066	Less than average on 4 criteria.	HS2.23	N/A	N/A	N/A
Land north of Blackwood Road	N/A	N/A	N/A	N/A	H25: Land at Blackwood	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
					Road, Stacksteads	
Land north of Commercial Street,	SHLAA16211	Poor on climate change and less than average on 5 criteria.	Do not allocate for housing.	Landscape issues.	N/A	N/A
Land north of Hud Hey	SHLAA16344	4 less than average criteria.	Do not allocate for housing.	N/A	NE2: Land North of Hud Hey	N/A
Land north of Knott Hill (west of Winterbutt Lee)	SHLAA16028	Performs poorly against water and less than average against 5 criteria.	Do not allocate for housing.	N/A	N/A	N/A
Land North of Lime Tree Grove	SHLAA16188	Less than average on 3 criteria.	N/A	N/A	HS2.42	N/A
Land north of Musbury Road	SHLAA16294	Performs poorly against water criteria but otherwise performs well.	Do not allocate for housing.	Intentions of landowners unknown. Relatively isolated.	N/A	N/A
Land north of Springside	SHLAA16152	Less than average against 5 criteria.	Do not allocate for housing.	Unknown ownership. Access is a major constraint. Adjoins Listed Buildings.	N/A	N/A
Land off Blackburn Road (A) Land off Blackburn Road, Ewood Bridge	SHLAA16276	Poor on climate change and 4 less than average.	Do not allocate for housing.	Relatively isolated from local services. Grassland and Woodland Stepping Stone Habitats. Several listed buildings adjoining the site. Landscape impact. Potential land contamination.	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Land off Blackburn Road (B) Land Off Blackburn Road/Hud Hey, Haslingden	SHLAA16339	2 double negative and 3 less than average.	Do not allocate for housing	Better suited for an employment use.	N/A	N/A
Land off Cherry Tree Lane	SHLAA16242	Performs poorly on climate change and less than average on 4 criteria.	Do not allocate for housing.	Playing field. Steep slopes in parts. Woodland identified as Stepping Stone Habitat.	N/A	N/A
Land off Coal Pit Lane	SHLAA16050	Performs poorly on climate change and less than average on 4 criteria.	Do not allocate for housing.	Unwilling landowners regarding 30% of the site.	N/A	N/A
Land off Greensnook Lane	N/A	Performs less than average against 5 criteria.	HS2.1	N/A	H26: Land off Greensnook Lane	N/A
Land off Highfield Street	N/A	Only two less than average criteria.	N/A	N/A	H48: Land off Highfield Street	N/A
Land off Lower House Green (Isle of Man Mill)	SHLAA16397	5 criteria perform less than average.	HS2.97	N/A	M3: Isle of Man Mill and Garage	N/A
Land off Lower House Green (Isle of Man Mill) E	N/A	N/A	N/A	N/A	N/A	N/A
Land off Moorlands Terrace	SHLAA16081	3 criteria less than average.	HS2.4	N/A	N/A	N/A
Land off Rockcliffe Road	N/A	Performs poorly on climate change and less than average on 3 criteria.	HS2.4	N/A	H33: Land off Rockcliffe Road	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Land off Taylor Avenue	SHLAA16140	Less than average on two criteria.	Do not allocate for housing.	Steep slopes. Woodland.	N/A	N/A
Land on Burnley Road	SHLAA16216	Performs poorly against climate change and less than average on 6 criteria.	Do not allocate for housing	Intentions of some landowners unknown. Surface water flood risk. TPO on part of the site.	N/A	N/A
Land opposite Baptist Church, Waterfoot	SHLAA16150	Less than average against 5 criteria.	HS2.100	N/A	N/A	N/A
Land opposite Church Lane	SHLAA16135	Performs poorly against climate change and less than average on 3 criteria.	Do not allocate for housing.	Steep, wooded and poor access.	N/A	N/A
Land Rear of Haslingden Cricket Club	SHLAA16284	3 double positives and two less than average.	N/A	N/A	H52: Land Rear of Haslingden Cricket Club	N/A
Land south of Alden Road	SHLAA16290	1 Red criteria for landscape but otherwise performs well.	Do not allocate for housing.	Intentions of landowners unknown. Covenant on the use of the site. Potential high landscape impact. Infrastructure on site.	N/A	N/A
Land South of Britannia Mill, Britannia	SHLAA16379	Performs less than average against 6 criteria.	Do not allocate for housing.	Steep slopes. Access is a major constraint. Green Belt.	N/A	N/A
Land south of Huttock Top Farm	SHLAA16077	Less than average on 4 criteria.	HS2.13	N/A	N/A	Highways issues.

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Land to rear of Hardman Avenue	SHLAA16239	2 criteria perform poorly (landscape/climate change) and 4 criteria less than average.	Do not allocate for housing.	Woodland area. Small part of the site is also a Grassland Stepping Stone Habitat.	N/A	N/A
Land to rear of Holland Avenue	SHLAA16224	4 criteria less than average.	Do not allocate for housing.	Mostly wooded, with access issues.	N/A	N/A
Land to rear of Lyndale Scout Hut	SHLAA16192	3 criteria perform less than average.	Do not allocate for housing.	Intentions of the landowners are unknown. Also steep with poor access.	N/A	N/A
Land to the east of Alder Grange School	SHLAA16183	Performs poorly on Landscape/Climate change and less than average on 2 other criteria.	Do not allocate for housing.	Access is a major constraint. No bus service within 400m. Surface water flood risk. Adjoins a Listed Building (Grade II). Landscape impact.	N/A	N/A
Land to the east of Johnny Barn 2	SHLAA16393	Less than average on 4 criteria.	HS2.53	N/A	N/A	N/A
Land to the east of Long Acres Drive, Whitworth	SHLAA16017	Less than average against 5 criteria.	Do not allocate for housing.	Intentions of landowners unknown. Access is a significant constraint. Landscape impact.	N/A	N/A
Land to the east of Tonacliffe School	SHLAA16002	Performs poorly against climate change and less than average on 5 other criteria.	HS2.106	N/A	N/A	Rejected by HRA – too close to the South Pennines SPA – Natural England to be concerned. Not identified for GB release. Willing landowner and developer. Strong community objection.

Site Name	SHLAA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Land to the north of Haslingden Tip and Under Brow farm	SHLAA16341	Performs poorly against climate change and less than average on 5 criteria.	Do not allocate for housing.	High and medium risk of flooding, steep site and access constraints.	N/A	N/A
Land to the north of Whitworth High School	SHLAA16012	Performs poorly against water and less than average against 5 criteria.	Do not allocate for housing.	Green Belt study recommends retaining Covenants relating to the land. Poor access.	N/A	N/A
Land adj to the rear of Oak Street, Shawforth	SHLAA16025	Performs poorly against climate change and below average against 4 criteria.	Do not allocate for housing.	SFRA Study -More than 50% of site in flood zone 2 and high risk of surface water flooding.	N/A	N/A
Land to the south east of Edenfield	SHLAA16268	Performs poorly against 3 criteria (landscape, biodiversity & climate change) and less than average against 2 others.	Do not allocate for housing.	Poor access due to narrow lanes. Surface water flood risk. Employment area to the south. Green Belt Study - retain but some flexibility on the boundary.	N/A	N/A
Land to the west of Moorland View, Edenfield	SHLAA16255	Performs less than average against 3 criteria.	HS2.71	N/A	N/A	Not identified for Green Belt release.
Land west of Holcombe Road	SHLAA16305	Performs poorly on 2 criteria-landscape and climate change adaptation.	Do not allocate for housing.	Adjoins a BHS and Listed Building. Landscape value. Coal mining risk.	N/A	N/A
Land west of Lomas Lane	SHLAA16394	Poor against transport plus five others less than average.	Do not allocate for housing.	Intentions of landowners unknown. Access is a major constraint. No good access to a bus service.	N/A	N/A
Land west of Sow Clough	SHLAA16088	Performs less than average against 6 criteria.	HS2.29	N/A	N/A	Poor access, landowners' intentions unknown.

Site Name	SHLAA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Lawson Street / Turton Hollow	SHLAA16220	3 less than average.	HS2.50	N/A	N/A	N/A
Lomas Lane	SHLAA16245	Performs poorly against transport and less than average on 5 criteria.	Do not allocate for housing.	N/A	N/A	N/A
Mayfield Chicks	SHLAA16276	Poor on climate change and 4 less than average.	EMP2.12	Green Belt Study supports release of Parcel 26 and Employment Study recommends retaining in Employment use, with extension to the north.	NE1: Extension to Mayfield Chicks	N/A
Middlegate Green, Goodshaw Chapel	SHLAA16200	Only 2 criteria less than average.	Do not allocate for housing.	Unwilling landowner. Small part of the site within Coal Authority high risk development area. Prone to flooding.	N/A	N/A
Mill End Mill	SHLAA16130	Performs poorly against water/employment & against 3 other criteria.	Do not allocate for housing.	Flood risks from the river and surface water. Potential land contamination.	N/A	N/A
Mount Zion Baptist & 240 Edgeside Lane	SHLAA16142	Performs less than average against 3 criteria.	Do not allocate for housing.	Access issues.	N/A	N/A
North of Carr Industrial Estate (E)	N/A	N/A	N/A	N/A	NE3: Land North of Carr Industrial Estate	N/A
North of Staghills Road	SHLAA16160	Performs poorly against climate change and less than average against 3 criteria.	Do not allocate for housing	Access difficult. Public Open Space and play area.	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Off Fernhill Drive	SHLAA16083	Performs poorly on Climate Change and less than average on 4 criteria.	HS2.5	N/A	H27: Off Fernhill Drive	N/A
Old Football Ground Manchester Road	SHLAA16277	Performs poorly on water (flooding) and less than average on 5 criteria.	Do not allocate for housing	Within Flood Zone 2; relatively isolated location. Green Belt Study recommends release of parcel 29. No keen developer interest.	N/A	N/A
Park Mill	N/A	N/A	N/A	N/A	M5: Park Mill	N/A
Park Road Garage Site	SHLAA16132	Performs less than average on 3 criteria.	HS2.91	N/A	N/A	Gradient present. Garage colony. In use Flooding/drainage issues – culvert.
Pike Law Quarry, Haslingden	SHLAA16310	Performs less than average on 4 criteria.	Do not allocate for housing.	Key role in separating Haslingden and Rawtenstall in Green Belt (retain parcel 15). Site has important ecological value. Potential heritage impacts if not mitigated.	N/A	N/A
Pike Law, Haslingden Old Road, Haslingden	SHLAA16320	2 double negative scores (including landscape) and less than average on 6 others.	Do not allocate for housing.	Key role in separating Haslingden and Rawtenstall in Green Belt. Landscape impact. Steep gradient. High voltage cables. Vehicular access.	N/A	N/A
Playing field north of Knowsley Crescent	SHLAA16030	Performs poorly against health and less than average on 4 criteria.	Do not allocate for housing.	Performs only moderately in terms of Green Belt but not recommended for release (parcel 62). Former playing to south.	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Plot 2 Land off Station Road, Haslingden	SHLAA16338	3 less than average criteria	Do not allocate for housing.	Too small to deliver 5 or more dwellings.	N/A	N/A
Plunge Farm	SHLAA16267	Performs poorly against 1 criterion (water) and 1 other.	Do not allocate for housing.	Plunge Road is narrow and not adequate for a major housing development. Relatively isolated from local services. Site is partly within a BHS and a wetland and heath stepping stone habitat.	N/A	N/A
Reed Street (H)	SHLAA16060	Less than average on 4 criteria	HS2.18	N/A	H21: Reed Street, Bacup	N/A
Rossendale Golf Club	SHLAA16285	Performs poorly on landscape but otherwise reasonable.	HS2.79	N/A	N/A	Green Belt Study recommends retaining Parcel 27.
Rossendale Motor Sales (E)	N/A	N/A	N/A	N/A	EE23: Rossendale Motor Sales, Bury Road (0.29ha developable area)	N/A
Shadlocks Skip	SHLAA16110	Performs poorly against employment and less than average against 3 criteria.	HS2.30	N/A	H35: Shadlock Skip	N/A
Site at Oakenhead/Holl and Avenue	SHLAA16226	Performs poorly against landscape and less than average on 2 criteria.	HS2.66/ HS2.64	Transport an issue if access taken off Holland Avenue. Land may be required for future school expansion.	N/A	N/A
Site off Horsefield	SHLAA16001	Performs poorly on climate change and less than average on 5 other criteria.	HS2.109	N/A	N/A	Rejected by HRA - too close to the South Pennines SPA - Natural England to be

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Avenue, Tonacliffe						concerned. Not identified for GB release. Willing landowner and developer. Strong community objection.
Snow King (Grane Road)	SHLAA16304	No major issue but 5 issues of some concern- biodiversity; natural resources, climate change and material assets.	HS2.78	N/A	H74: Grane Village	N/A
South of Forest Mill, Water	SHLAA16377	Performs less than average on 5 criteria.	HS2.99	N/A	N/A	Landowners intentions unknown, landscape impacts.
Swinshaw Hall, Loveclough	SHLAA16206	Poor against climate change and less than average against 5 criteria.	HS2.47	N/A	H5: Swinshaw Hall Loveclough	N/A
To the west of Tong Farm, Bacup	SHLAA16047	5 criteria less than average.	HS2.17	N/A	H30: Tong Farm	N/A
Thirlmere Way, Goodshaw Chapel	SHLAA16199	3 criteria less than average.	Do not allocate for housing	No bus service within 400m. Adjoins a Listed Building (Grade II*). Keen to retain for local informal open space.	N/A	N/A
Thorn Bank	SHLAA16058	Only two criteria are less than average.	HS2.22	N/A	H41: Thorn Bank	N/A
Thorn Gardens	SHLAA16059	3 less than positive criteria.	Do not allocate for housing.	Too small to deliver 5 or more dwellings due to steep slopes along Tong lane.	N/A	N/A
Townsend Fold	SHLAA16253	N/A	Do not allocate for housing.	Area west of Irwell is in the Green Belt and identified for retention. Factory units aren't in Green Belt.	N/A	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
				Significant Flood Risk issues- requires Exception Test.		
Fmr Valley Centre / now Spinning Point	SHLAA16238	Less than average on 1 criterion.	HS2. 55	N/A	N/A	N/A
Waingate near Spring Side	SHLAA16180	Performs less than average against 3 criteria.	Do not allocate for housing	Waingate Manor is listed. Access is a significant constraint as Highway Authority unwilling to accept an access via Marl Pits.	N/A	N/A
Land off Waingate Lane, Rawtenstall	SHLAA16181	N/A	Do not allocate for housing.	Poor vehicular access via a narrow track. No bus service within 400m. Adjoins listed building. Potential high landscape impacts.	N/A	N/A
Waterfoot Primary School	N/A	Performs poorly against employment and less than average against 2 criteria.	HS2.90	N/A	H53: Waterfoot Primary School	N/A
Wavell House	N/A	Only one minor issue with material assets.	HS2.75	N/A	N/A	Under construction.
Whinberry View	N/A	N/A	N/A	Site has consent for residential development.	N/A	N/A
Willow Avenue off Lime Tree Grove	SHLAA16187	N/A	HS2.45	N/A	H15: Willow Avenue off Lime Tree Grove	N/A
Woodlands Close, Stagghills, Newchurch	SHLAA16161	Performs poorly against climate change and less than average against 4 criteria.	HS2.83	N/A	H61: Hareholme	N/A

Site Name	SHLA Ref	Summary of assessment in SA Regulation 18	Reg 18 Ref	Reason for not allocating in Reg 18	Reg 19 Ref	Reason for not allocating in Reg 19
Woodtop Garage, Townsendfold	SHLAA16250	Performs poorly re Climate change & less than average on 3 criteria.	Do not allocate for housing.	Intentions of landowners unknown. Woodland Stepping Stone areas on 2/3 of site.	N/A	N/A
Lower Old Clough Farm, Weir	SHLAA16072	Performs less than average against 9 criteria.	Do not allocate for housing.	Intentions of landowners unknown. Poor access and isolated from local services. Overhead electricity line passing through the site.	N/A	N/A
Land south of The Weir Public House	N/A	N/A	N/A	N/A	H42: Land south of the Weir Public House	N/A

# 4 Policy Assessment

## 4.1 Strategic Policy SS: Spatial Strategy

4.1.1 Below is the assessment of Policy SS of the Regulation 19 Consultation version of the Local Plan. Please see the SA Regulation 19 Report for details of the methodology for the assessment process.

1	2	3	4	5	6	7	8	9	10	11	12	13
Landscape	Cultural Heritage	Biodiversity and Geodiversity	Water and Flooding	Natural Resources	Climate Change Mitigation	Climate Change Adaption	Human Health	Material Assets	Housing	Employment Location	Employment Skills	Transport
-	-	-	-	-	-	-	-	-	+	+	-	-

### Strategic Policy SS: Spatial Strategy

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 main urban areas 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.

To promote vibrant local communities and support services, an appropriate scale of growth and investment will be encouraged in identified Local Service Centres, providing it is in keeping with their local character and setting.

The Council will work with partners and developers to protect and enhance the ecological corridor network and the Borough’s built heritage.

Growth and investment will be concentrated in:

- a) The Key Service Centres of:
  - i. Rawtenstall;
  - ii. Bacup;
  - iii. Haslingden; and
  - iv. Whitworth.
- b) Major Sites allocated at:
  - i. Edenfield;
  - ii. Futures Park;
  - iii. New Hall Hey;
  - iv. Carrs Industrial Estate; and
  - v. Barlow Bottoms.

- c) 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; and
  - viii. Britannia.
- d) Limited growth and investment will be encouraged at the following Rural Local Service Centres to help meet local housing and employment needs and to support the provision of services to the wider area:
- i. Loveclough/ Goodshaw;
  - ii. Water;
  - iii. Weir; and
  - iv. Whitewell Bottom.
- e) In other places – such as smaller villages and substantially built up frontages – development will typically be small scale and limited to appropriate infilling, conversion of buildings and proposals to meet local need, unless there are exceptional reasons for larger scale redevelopment schemes:
- i. Acre;
  - ii. Chatterton;
  - iii. Cowpe;
  - iv. Ewood Bridge;
  - v. Irwell Vale;
  - vi. Turn; and
  - vii. Sharneyford.

## SA1 - Landscape

Policy SS aims to protect the landscape and current character of the Plan area. With the majority of development directed within or on the fringes of urban areas, there is some scope for development to be in-keeping with the existing settlement. However, development at the edge of settlements has the potential to result in negative impacts on countryside views currently experienced by local residents. Development will be primarily focused towards previously developed land, which would be anticipated to help reduce potential adverse impacts on the local landscape.

The majority of the development locations identified under Policy SS are situated in the Settled Valleys Landscape Character Type (LCT) (Broadley, Whitworth, Facit, Barlow Bottoms, Britannia, Future's Park, Bacup, Sharneyford, Steakstead, Waterfoot, Whitewell Bottom, Water, Love Clough, Crawshawbooth, New Hall Hey, Rawtenstall, Helmshore, Ewood Bridge, Irwell Vale, Edenfield and Chatterton). This LCT has moderate to high sensitivity to new development, particularly in relation to scale and heritage. It is uncertain if new development at these locations would result in negative impacts on the local landscape.

The development locations Stubbins, Turn, Acre, Carrs Industrial Estate, Cowpe and Weir are situated in the Moorland Fringes/ Upland Pastures LCT. This LCT has high sensitivity to new development and therefore, it would be likely that development

	<p>within these six development locations would have a negative impact on the local landscape.</p> <p>The development location Haslingden is located within the Urban LCT, which has not been assessed for its landscape sensitivity.</p>
SA2 – Cultural Heritage	<p>Barlow Bottoms, Facit and Whitworth are all located within close proximity to Whitworth Cemetery Registered Park and Garden. It is not yet known where developments proposals will be located in these development locations, however, development at these three locations could potentially have a negative impact on the setting of this Registered Park and Garden.</p> <p>The Scheduled Monument, Higher Mill, Helmshore, is located to the west of Helmshore. It is uncertain if development at this development locations would have a negative impact on the character or the setting of this historic asset.</p> <p>There are no Grade I Listed Buildings in Rossendale.</p> <p>There are several Grade II* Listed Buildings located within the development locations identified in Policy SS. This includes; Grane Mill in Haslingden, Rawtenstall Cenotaph, The Laurels in Bacup, Waggoner Tunstead Farmhouse in Steakstead, Church of St John the Evangelist, Crawshaw Hall and Friend’s Meeting House, all in Crawshawbooth, Charter Place Hall in Acre and Ewood Hall in Ewood Bridge. It is not yet known where developments proposals will be located in these development locations, however, development proposals may alter the character or setting of some of these Grade II* Listed Buildings.</p> <p>There are numerous Grade II Listed Buildings within the Borough, many of which are located within the development locations identified in this Policy. As such, development proposals would be likely to result in negative impacts on the character and setting of some Grade II Listed Buildings across the Borough to some extent.</p> <p>There are nine Conservation Areas located within the Borough. The planned development under Policy SS could potentially result in negative impacts on the Irwell Vale, Chatterton/Strongstry, Rawtenstall Town Centre, Love Clough Fold, Bacup Town Centre and Whitworth Square Conservation Areas.</p>
SA3 – Biodiversity	<p>Edenfield, Carrs Industrial Estate, Chatterton and Irwell Vale are all located within an Impact Risk Zone (IRZ) of West Pennine Moors, Hodge Clough and Lower Red Lees Pasture SSSIs which states that residential development of 100 dwellings or more should be consulted on with Natural England.</p> <p>Stubbins is located in close proximity to Lower Red Lees Pastures SSSI and is within an IRZ which states that residential development of 50 dwellings or more should be consulted on.</p> <p>There are no National Nature Reserves located in close proximity to any of the development locations, however, Broadley is located in close proximity to Healey Dell Local Nature Reserve.</p> <p>Broadley is also located near to some stands of ancient woodland. Development proposals at other locations listed in this policy would not be expected to result in negative impact on stands of ancient woodland.</p>

	<p>There are numerous Important Wildlife Sites and Biological Heritage Sites located across the Borough. Edenfield, Futures Park, Stubbins, Broadley, Crawshawbooth, Acre, Cowpe, Ewood Bridge, Irwell Vale and Turn are all located in close proximity to one of these designated sites.</p> <p>Although the exact location of proposed development is uncertain, development in these locations could potentially result in negative impacts on the surrounding biodiversity sites due to an increase of threats and pressures associated with increased numbers of nearby residents.</p> <p>The development location of Steakstead coincides with Steakstead Gorge, a Local Geodiversity Site. It is uncertain if development within Steakstead would have a negative impact on this geological feature.</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">SA4 – Water and Flooding SA7 – Climate Change Adaptation</p>	<p>Numerous development locations listed in Policy SS are coincident with land situated in Flood Zones 2 and/ or 3. Some of the identified development locations coincide with land at risk of fluvial flooding (Irwell Vale, Carrs Industrial Estate, Crawshawbooth, Waterfoot, Whitewell Bottom and Whitworth). Some other development locations are surrounded by land at risk of fluvial flooding (Stubbins, Chatterton, Ewood Bridge, Acre, Water, Steaksteads, Bacup, Shareyford, Helmshore, Haslingden, Rawtenstall and Facit). Development at these locations could potentially locate new residents in areas at risk of flooding.</p> <p>All of the development locations listed in Policy SS comprise areas at risk of surface water flooding. It is uncertain if future development proposals would situate new residents on land at risk of surface water flooding. Development in areas of surface water flood risk could also exacerbate flood risk in surrounding areas.</p> <p>The development proposed in this Policy would be likely to be located on greenfield sites on valley slopes, and this loss of Green Infrastructure (GI), could exacerbate flood risk in the valley below.</p> <p>The development proposed in Rossendale would be expected to increase the Borough’s water consumption to some extent.</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">SA5 – Natural Resources</p>	<p>All of the development locations identified in Policy SS are located on Grade 4 Agricultural Land Class (ALC). This is not classified as some of the Borough’s best and most versatile (BMV) land and therefore, it is not anticipated that development would result in a loss of this important soil resource.</p> <p>The loss of soil is a permanent and irreversible impact. Although soil that would be lost due to development under this Policy is not some of the Borough’s BMV, development would still result in a significant loss of ecologically important soil.</p> <p>There are areas of confirmed contaminated land in Helmshore, Rawtenstall, Edenfield, Whitewell Bottom, Steakstead, Futures Park, Bacup, Weir and Britannia. Development at these locations could potentially pose a risk to human health.</p> <p>The majority of the development locations identified under Policy SS are located in the valleys. These valleys are known to trap airborne pollutants. Many of the new residents would be located in close proximity to a major road or the AQMA located in Rawtenstall. This would be likely to increase local traffic and expose new and existing residents to emissions which are harmful to human health.</p>

SA6 – Climate Change Mitigation	<p>Under this Policy, development proposals will be directed towards previously undeveloped land to some extent. This would be likely to result in a loss of GI. This would be expected to reduce the carbon sink function of local vegetation as well as exacerbate the Urban Heat Island effect.</p> <p>The construction and development of new homes across the Borough would be anticipated to increase greenhouse gas emissions in the Plan area in comparison to current levels. New residents would be likely to have a high reliance on personal car use due to the rural nature of Rossendale, which could further exacerbate these emissions.</p>
SA8 – Human Health	<p>There are no NHS Hospitals located within Rossendale. Royal Blackburn Hospital, Accrington Victoria Hospital and Burnley General Hospital are located to the north of the Borough, Fairfield General Hospital and Rochdale Infirmary are located to the south. The development locations of Acre, Carrs Industrial Estate, Haslingden, Love Clough, Crawshawbooth, Rawtenstall, Stubbins, Chatterton, Turn, Britannia, Barlow Bottoms, Facit, Whitworth and Broadley are all situated within the target distance to one of these hospitals and therefore, new residents at these locations would be expected to have good access to this essential health service. The other fourteen development locations identified in Policy SS are not situated within the target distance to hospitals and therefore new residents would be likely to have limited access to this healthcare service.</p> <p>There are six GP surgeries located across the Borough. New residents at Haslingden, Carrs Industrial Estate, Rawtenstall, New Hall Hey, Waterfoot, Cowpe, Futures Park, Bacup, Facit and Whitworth would be likely to be situated within the target distance to one of these surgeries and therefore, have good access to the services they provide. New residents in Turn, Stubbins, Chatterton, Edenfield, Irwell Vale, Ewood Bridge, Helmshore, Acre, Love Clough, Crawshawbooth, Water, Whitewell Bottom, Stacksteads, Weir, Sharneyford, Britannia, Barlow Bottoms and Broadley would not be located within the target distance to a GP surgery and therefore, would be unlikely to have adequate access to this healthcare service.</p> <p>There are three leisure centres located in Rossendale; Haslingden Sports Centre, Marl Pits Leisure Centre and Whitworth Leisure Centre. The development locations Helmshore, Haslingden, Carrs Industrial Estate, Rawtenstall, New Hall Hey, Waterfoot, Barlow Bottoms, Facit and Whitworth are all located within the target distance of one of these leisure centres. New residents at these locations would be expected to have good access to a range of activities provided by these leisure centres to facilitate healthy and active lifestyles. All other development locations listed under Policy SS would not situate new residents within the target distance of a leisure centre and therefore, new residents could potentially have limited access to this service.</p> <p>It is likely that the proposed development under this Policy would result in the allocation of greenfield sites for residential development. This would be likely to reduce the quantity of suitable and accessible open space for local residents in some locations. Good access to open space is known to have positive impacts on the physical and mental health of residents. However, due to the rural nature of the Borough, the majority of new residents would be expected to have good access to the surrounding countryside and a diverse range of natural habitats.</p>

SA9 – Material Assets	The construction and occupation of new dwellings and employment space within Rossendale under Policy SS would be expected to significantly increase waste production within the Plan area.
SA10 – Housing	By identifying locations for growth and investment, this Policy would be likely to result in an increase in housing provision across the Plan area. However, Policy SS does not identify the quantity of dwellings to be developed across the Plan area and it is therefore uncertain if this would meet the identified housing need.
SA11 – Employment Location	By identifying locations for growth and investment, this Policy would be likely to result in an increase in employment floorspace across the Plan area. However, Policy SS does not identify the quantity of employment floorspace that would be delivered across the Plan area and it is therefore uncertain if this would meet the identified employment need.
SA12 – Employment Skills	<p>There are numerous primary schools located across the Borough. The majority of the development locations identified in Policy SS are located within the target distance to one of these primary schools and therefore, new residents would have good access to one of these educational establishments. Turn and Love Clough are situated outside the target distance to a primary school and therefore residents at these locations would be likely to have limited access to primary education.</p> <p>There are six secondary schools located across Rossendale; Haslingden High School, All Saints Catholic High School, Alder Grange High School, Fearn Community Sports College, Bacup and Rawtenstall Grammar School and Whitworth High School. The development locations Edenfield, Stubbins, Chatterton, Turn, Acre, Love Clough, Water, Weir, Sharneyford, Britannia, Futures Park and the majority of Bacup are located outside the target distance to these schools, and therefore, new residents at these locations would be likely to have limited access to secondary education facilities. New residents in the other 16 identified locations would be likely to have good access to some of these educational establishments as they would be located within the target distance.</p>
SA13 – Transport	<p>Public transport options are limited within the Borough. There is no active railway station, and bus services are limited in rural areas. Many new residents under Policy SS would be situated in rural areas and would therefore not be likely to be within 30 minutes travel time of key facilities by bus.</p> <p>As it is expected that some development would be directed to the outskirts of urban areas, it is uncertain if new public transport links would be provided if no links are currently available. Some new residents could potentially be located in areas with limited access to existing transport routes.</p> <p>New residents in some of the Key Service Centres would be expected to have good walking and cycling access to nearby services through the Public Rights of Way (PRoW) network. In more rural areas of the Borough, it would be unlikely that new residents would be able to walk or cycle to some services.</p> <p>Development proposed under this Policy would be likely to increase pressures on existing transport links, including public bus services and road networks.</p>

# Appendix A

## Representation 5145

### 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.

## Representation 5148

### 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<sup>27</sup>”*. 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).”<sup>28</sup>*

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?

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<sup>27</sup> Sustainability Appraisal August 2018 (Para 2.4.1)

<sup>28</sup> Sustainability Appraisal August 2018 (Appendix D, Para 1.1.4)

- 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?

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.

## Representation 5160

- 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.**

## Representation 5173

### **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.



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