

Rossendale Local Plan Examination

MATTERS, ISSUES AND QUESTIONS (MIQs)



Matter 5 – Employment need and supply

Issue - Does the Plan set out a positively prepared strategy for the delivery of employment development and jobs, which is justified, effective and consistent with national policy?

[Policies EMP1 – EMP5]

Questions

Employment provision

a) Is the identified Functional Economic Market Area of Rossendale justified?
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5.1 The PPG¹ states that as patterns of economic activity vary from place to place, there is no standard approach to defining a Functional Economic Market Area [FEMA], although it is possible to define them taking account of a range of factors including travel to work areas; the flow of goods and services; the administrative area; the HMA; and the service market for consumers.

5.2 The level of self-containment in Rossendale is a little below that which is normally taken to describe and define a FEMA. CLG's 2010 Guidance "*Functional Economic Market Areas: An economic note*", which defines FEMAs as where at least 75% of a Travel To Work Area's (TTWA's) resident economically active population also work in the area, and of all those working in the area at least 75% also live there. According to the 2011 Census almost 17,000 residents lived and worked in Rossendale out of just over 24,000 people who work here. This means 69% of people working in the Borough also live there, so is below the 75% level considered to be a self-contained FEMA.

5.3 The pattern of where people live and work in Rossendale is complicated by the influence of Blackburn and Manchester, who draw a lot of residents into their TTWAs. This probably results in a higher proportion than might be expected of those who live in the north, west and south of the Borough working outside the Borough.

5.4 Nonetheless, despite these characteristics, the "best fit" FEMA was judged by Lichfields to be the Borough. That is the approach the plan adopts. It is a compromise. But the definition of a FEMA is an imprecise science, and on the

¹ PPG ID: 61-018-20190315

basis that almost 70% of the Borough's population live and work in Rossendale it is considered a proper compromise.

5.5 As required by the NPPF, the Council has worked closely with adjoining districts, including Blackburn with Darwen, Bury and Rochdale as part of the duty to co-operate to ensure that the needs of businesses and commuting residents are being effectively met. The Greater Manchester Spatial Framework [GMSF], which will identify employment land requirements across all 10 GM districts, is ongoing. Blackburn with Darwen has its own adopted Local Plan that seeks to meet its own employment land needs in full. From a practical perspective it was agreed that RBC should continue to meet its own needs within its own area, and there was no requirement for it to take on board any B-Class employment land requirements from elsewhere (and vice versa). This is confirmed in the Duty to Co-operate and Draft statement of Common Ground 2019 (ref SD008), and supported by relevant email correspondence.

b) Is the identified objectively assessed need (OAN) of 22-32 hectares of employment land over the period 2014 to 2034, as set out in the Employment Land Review, soundly based? In particular:

- i. Is the allowance for employment land/premises which may be lost to non-employment use (some 26 hectares) justified and supported by the evidence? To what degree could the allowance be affected by an upturn in the local economy?**
- ii. Is it reasonable to apply a flexibility buffer (1.99 ha), in the context that an uplift above OAN is also applied in the Plan (see below)?**
- iii. Are the employment density and plot coverage assumptions used to translate the jobs estimates into land requirements justified and robustly based?**

(b) i Is the allowance for employment land/premises which may be lost to non-employment use (some 26 hectares) justified and supported by the evidence? To what degree could the allowance be affected by an upturn in the local economy?

5.6 The Rossendale Employment Land Review (p76) advises that to convert the net requirement for employment space into a gross requirement (the amount of employment space or land to be allocated), an allowance is typically made for some replacement of losses of existing employment space that may be developed for other, non B-Class uses in future. This is a widely accepted approach in planning for future employment land needs as without such an adjustment the employment land portfolio could shrink over time.

5.7 In their study, undertaken for Rossendale BC, Lichfields identified an allowance for future losses which they considered appropriate based on their understanding of supply-side deliverability factors in Rossendale and current trends in the market. This sought to balance evidence on the scale of past losses against the likelihood of this continuing due to the strength of the commercial market and competing uses on selected employment sites.

5.8 Some losses will need to be replaced in order to refresh the quality of the stock and to avoid the employment land supply continually declining, but not necessarily all losses as some will reflect restructuring in the local economy as less space may be needed in some sectors in future.

5.9 Against this argument is the likelihood that other sites may also be lost by 2034, and these will represent losses to the overall land portfolio, and so reduce choice within the market. For example, the SHLAA in 2010 found that of 416 sites assessed there were 38 classified as being industry or business, with a cumulative area of 28.66 ha (or 1.91 p.a. over 15 years). Also, a number of extant planning permissions relating to the loss of B-Class employment land to alternative, usually higher value uses, such as residential or retail, remain outstanding. Over the past 2 years alone, these comprise 0.85 ha of land that could be lost from the employment land portfolio if/when the planning permission is implemented. This is in addition to the 3.17 ha that have already been lost during this time. Although not all of these will be lost to dwellings it should be remembered that the Government has introduced Permitted Development Rights permitting to streamline 'office-to residential' conversion.

5.10 Balancing all of the above considerations Lichfields suggested that a replacement factor of 1.35 ha per annum (reflecting past trends) would be appropriate, although they caveat that this needs to be monitored. This works out at 26.9 ha over 20 years.

(b)ii What effect could an uplift in the economy have on this?

5.11 An uplift in the economy may result in greater losses of employment land as the need to find more residential land becomes more pressing. Conversely losses may reduce as the need to retain and replenish the stock of employment land becomes more paramount.

5.12 The general consensus of commercial property agents with experience and knowledge of the Rossendale commercial property market, who were contacted by Lichfields in the drafting of this Study, is that the office to residential conversion is a current concern. They also highlighted that much of the existing employment land stock is no longer fit for purpose and should be replenished with better quality units more suited to meeting modern operator requirements. Employment growth in the Borough has been slow too they argued because of the constrained supply of land.

5.13 Lichfields' recommendation to continually monitor the losses of employment land is necessary given the current economic and political uncertainties, including those surrounding Brexit. If the economy performs better than expected, then this would not necessarily result in a dropping off of B-Class losses. It could result in additional pressures being placed on the

Borough’s employment land portfolio, as any associated uplift in the housing market could encourage housebuilders to identify new sites, in more challenging areas such as former employment sites.

5.14 It will be important to keep this under review and to continue monitoring employment land losses as well as take-up. As explained below a 2-year flexibility factor has been incorporated which so long as the delivery of employment land is kept under review should allow for any upturn in the short term.

(b)iii Is it reasonable to apply a flexibility buffer (1.99 ha), in the context that an uplift above OAN is also applied in the Plan (see below)?

5.15 The NPPF requires that planning policies should “*be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.*” [paragraph 81 d]

5.16 To estimate the overall requirement of employment space that should be planned for allocating sites and to allow for some flexibility of provision, it is normal practice for ELRs to add an allowance as a safety margin for factors such as delays in some sites coming forward for development.

5.17 This margin is a contingency factor, providing a modest additional land buffer so that supply is not too tightly matched to estimated demand, and so that shortages of land do not arise if future demand turns out to be greater than the forecasts. Such flexibility is sensible given the uncertainties in the forecasting process and the scope for delays in developing employment space.

5.18 The South East England Planning Partnership Board (SEEPB) Guidance on employment land assessments recommends an allowance that is equivalent to the average time for a site to gain planning permission and to be developed, typically about two years. For Rossendale Borough, on the basis of the long term gross average annual completions, a figure of 1.99 ha was incorporated (i.e. 2 years worth of 0.99 ha annual take up).

5.19 Factoring in a safety/flexibility factor should help alleviate any future land shortages should demand in the future actually turn out to be greater than forecasted. In Lichfields’ opinion “such flexibility is sensible given the uncertainties in the forecasting process and the scope for delays in developing employment space” (p 76).

Rossendale Safety Margin Allowances

All B-Class Uses	Gross Average Annual Take-up (ha)	2-year Safety Margin Added 2014-2034
Rossendale	0.99	1.99

Source: Lichfields Analysis

Are the employment density and plot coverage assumptions used to translate the jobs estimates into land requirements justified and robustly based?

5.20 The ELR (at page 66) sets out the approach taken to translate B-Class job growth into employment floorspace projections. The job densities are based on the HCA's (November 2015) Employment Densities Guide, 3rd Edition, adjusted by Lichfields to translate Net Internal Areas (NIA) to Gross External Areas (GEAs), and FTEs to workforce jobs, for planning purposes. The HCA Guidance (which remains the most up to date available at the time of writing) takes account of recent trends in terms of the changing use of employment space, the main change being the more efficient utilisation of office space due to increased flexible working and hot-desking. This has resulted in a decrease in the amount of floorspace per office worker compared to previous guidance.

5.21 As Lichfields' ELR notes (para 9.77), the estimates of land requirements are highly sensitive to the various assumptions used.

5.22 To estimate floorspace needs, the following average ratios were applied in the ELR modelling:

- 1 One B1a/b general office workforce job requires 12.5 sqm of employment floorspace [GEA];
- 2 One B1c light industrial workforce job requires 53.5 sqm of employment floorspace [GEA];
- 3 One B2 industrial FTE job requires 36 sqm of employment floorspace [GEA];
- 4 A combined B1c/B2 factor of one job per 45 sqm was obtained by taking an average of the aforementioned B1c/B2 GEA equivalents;
- 5 One job per 65 sqm for general, smaller scale warehousing (assumed to account for 70% of future space) and 1 job per 80 sqm for large scale, lower density units (assumed to account for 39% of future space) [GEA]².

Plot Ratio

5.23 The ELR has adopted the floorspace ratios and plots ratios reported in the former ODPM Guidance Employment Land Reviews Guidance Note (2004). This document states that plot densities typically range from 0.25-0.40 for Business Parks; from 0.35 to 0.45 for industrial land; from 0.40 and 0.60 for warehousing; and from 0.41 to 2.00 for town centre office. On this basis, the ELR assumed that a gross area of 1 ha is required to develop 4,000 sqm of industrial, commercial or warehousing / distribution space (equal to a plot ratio of 40%). This plot ratio reflects typical development densities for these uses and is a widely used metric in Employment Land Studies across the country.

² Given that the majority of B8 warehousing has been low bay warehousing in Rossendale in recent years, around 70% of future demand is estimated to be for 'small' warehousing and the remainder for larger high bay warehousing.

c) Paragraph 116 in the Plan confirms that the Council has identified an employment land requirement of 27 hectares. Is this figure justified and supported by robust evidence? If the employment requirement is based on labour supply estimates, are there implications arising from the different Plan periods for the housing and employment requirements in the Plan (2019-34 v. 2014-34)?

Is this figure justified and supported by robust evidence?

5.24 The Employment Land Review was prepared in 2017 on behalf of the Council by Lichfields, a highly experienced planning consultancy that has produced a considerable number of ELRs across the country (and particularly in East Lancashire) in recent years, and has been engaged with RBC in producing its housing and economic evidence base for many years.

5.25 Lichfields has followed the same approach to defining employment land needs that it has used for other ELRs that have been found sound at EiP, and it is an approach that accords with both the NPPF's requirement for planning positively for economic growth (paragraph 81a), but which aligns with the Housing and Economic Development Needs Assessment section of the Practice Guidance, which advises that:

"Strategic policy making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions"³

5.26 In particular, it recommends that policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as:

- Sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand);
- Demographically-derived assessments of current and future local labour supply (labour supply techniques);
- Analysis based on the past take-up of employment land and property and/or future property market requirements; and,
- Consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, and monitoring of business, economic and employment statistics.

5.27 Within this context, a number of potential future scenarios are considered within the ELR in order to provide a framework for assessing future B-class employment space requirements in Rossendale over the 20-year period 2014 to 2034.

³ PPG ID: 2a-025-20190220

5.28 In line with the PPG’s requirements, the quantitative forecasting techniques applied were as follows:

- a Baseline employment forecasts (labour demand), using Experian’s Local Market Quarterly Forecasts for September 2016;
- b Estimated growth in the local labour supply – and the jobs and employment space that this could be expected to support – having regard to analysis presented as part of the Borough’s Strategic Housing Market Assessment [SHMA]; and
- c Consideration of past take-up of employment space based upon monitoring data provided by RBC and how these might change in future.

5.29 All of these forecasting techniques have their own strengths and weaknesses. Ultimately it is appropriate that the Borough’s economic growth potential (and the likely demand for employment space) needs to be assessed under a variety of future scenarios that reflect alternative growth conditions that could arise over the study period. In reconciling the various scenarios, consideration needs to be given to how appropriate each is to the particular circumstances and aspirations of RBC. Qualitative factors have also been taken into account, identified through an analysis of economic and market conditions, as well as through extensive consultation with economic stakeholders, commercial agents and local businesses.

5.30 Chapter 9 of the ELR discusses in detail the future requirements for B-class employment space within Rossendale and the diagram below summarises the steps taken this in-depth work.

Staged Approach to Employment Land Requirements



5.31 In summary, the demand-led range of indicative total gross land requirements to 2034, factoring in a 2-year margin of choice, results in the following range of demand projections from 21.9 ha (Past Take-Up) to 34.7ha based on econometric demand-led projections) for Rossendale:

- Econometric demand led projections: 30.3 ha – 34.7 ha;
- Labour Supply projections: 26.3 ha – 27.2 ha;

- CS 247 dpa target: 30.3 ha;
- Past Take Up: 21.9 ha.

5.32 Table 2 below shows the scale of B-Class Employment Land required according to each scenario (Table 9.16, p 78).

Table 1 Rossendale Gross Employment Land Comparisons 2014-34

		B1a/b	B1c/B2	B8	TOTAL
1) Experian Baseline	2014-2034 (net)	0.28	-3.47	4.55	1.36
	2014-2034 (gross)				28.29
	+ Flexibility factor				30.27
2) Regeneration / Policy On	2014-2034 (net)	0.85	-2.70	4.55	2.70
	2014-2034 (gross)				29.63
	+ Flexibility factor				31.61
3) CS Jobs Target	2014-2034 (net)	0.89	-2.03	6.94	5.79
	2014-2034 (gross)				32.71
	+ Flexibility factor				34.70
4) Labour Supply (183 dpa)	2014-2034 (net)	-0.14	-4.84	2.39	-2.59
	2014-2034 (gross)				24.33
	+ Flexibility factor				26.32
5) Labour Supply (202 dpa)	2014-2034 (net)	-0.14	-4.84	2.39	-2.59
	2014-2034 (gross)				24.33
	+ Flexibility factor				26.32
6) Labour Supply (220 dpa)	2014-2034 (net)	-0.08	-4.55	2.87	-1.76
	2014-2034 (gross)				25.17
	+ Flexibility factor				27.15
7) CS 247 dpa Target	2014-2034 (net)	-0.29	-3.50	0.29	1.41
	2014-2034 (gross)				28.33
	+ Flexibility factor				30.32
8) Past Take Up Rates	2014-2034 (net)	-3.56	-3.49		-7.05
	2014-2034 (gross)				19.87
	+ Flexibility factor				21.86

Source: Lichfields Analysis

5.33 In coming to a view on the appropriate B-Class range, Lichfields set out the following key considerations to arise from the modelling and the consultation with key stakeholders over the course of the study:

- There is a lack of good quality small to medium-sized industrial premises, which is suppressing demand. In particular, the limited level of development in recent years has restricted the availability of sites for indigenous businesses to expand.

- Future realisable demand may be further restricted by the current poor and ageing existing stock, particularly to the east of the Borough; lack of public investment in infrastructure; limited number of industrial estates/business parks, and weak inward investment offering relative to adjoining areas (such as Greater Manchester and other parts of East Lancashire).
- Agents suggested that there is strong underlying demand for B2 industrial premises and to a lesser extent B8 warehousing.
- Out-commuting into neighbouring authorities for work remains a major issue for Rossendale, with a net loss of around 8,560 employed residents daily. There are high levels of net out-commuting to Rochdale, Bury and Burnley.
- Rossendale has a low job density ratio of around 0.54 compared to the North West average of 0.78 (2014). Rebalancing the land uses of the Borough to ensure that more, and better quality, jobs are provided could help to reverse this trend and 'clawback' out-commuters, reducing net out-commuting rates.
- Labour supply analyses for Rossendale based on the delivery of between 183 dpa and 247 dpa indicate that the number of economically active residents is forecast to increase slightly over the coming years. On this basis, between 26 and 30 ha (gross) could be required up to 2034.
- The former CS Jobs target scenario was not taken forward in the Local Plan. As such, the 34.7 ha of employment land that would align with this scenario is an outlier.

5.34 Consequently, on the basis of these considerations, a range of between 22 ha and 32 ha (gross) of employment land was considered appropriate to 2034. This is approximate to the Past Take Up scenario at the lower end, and the labour supply/econometric job demand projections at the top end.

5.35 The range aligns with Rossendale's housing strategy; the need to revitalise current poor quality stock; the imbalance of the portfolio in terms of the size of properties available, continued demand for B2 floorspace (particularly from indigenous companies) and the emerging business service sectors, whilst factoring in the continued economic uncertainty and the practicalities of the physical constraints of the authority area which would preclude a step-change in delivery.

5.36 Furthermore, it is recognised that the labour supply projections which link to the Objectively Assessed Housing Need are towards the lower end of this range. Whilst it has been acknowledged that there is not a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes.

5.37 RBC has taken the decision to pursue a figure of 27 ha of B-Class land, which aligns with a housing target of 220 dpa, which is broadly in line with the Local Housing Need figure of 212 dpa.

d) Are there any implications for employment OAN and employment land requirements arising from the updated employment forecasts in the SHMA 2019? (also see Matter 3cii)

5.38 At the time the ELR was drafted, Lichfields had been asked by the Council to model employment land needs covering the 20-year period 2014-34. This no longer aligns with the Local Plan period, which equates to a 15-year period 2019-2034. As such, Lichfields has now re-modelled the scenarios that were used in the 2017 ELR to inform the assessment of the Borough's future employment land needs, with the period shortened by 5 years to 2019 to 2034 to reflect the Local Plan period.

5.39 As opposed to running the Labour supply scenarios in the original ELR (which related to 183 dpa, 202 dpa and 220 dpa), Lichfields has modelled the data from the latest SHMA Update, from March 2019. This used the PopGroup demographic modelling tool and its outputs for the following scenarios and outputs:

- Scenario B: 2014-based SNPP baseline (198 dwellings per annum [dpa]); and,
- Scenario C: 2014-based SNPP re-based to 2017 MYE (210dpa).

5.40 Scenario B generated a net job growth of 382 over the period 2019-34, whilst Scenario C generated a net job growth of 303 over the same time period. Whilst it may seem somewhat unusual that Scenario C has a slightly lower level of job growth despite a higher level of population (and household) growth, this is due to shifts in the growth of the population by age cohort in the 2015/2016 and 2017 MYE that are not reflected in the 2014-based SNPP. The balance between growth attributable to natural change, and that attributable to net inward migration, has also shifted. This culminates in a slightly weaker growth in labour supply for Scenario C.

5.41 The full breakdown for Rossendale Borough is set out in Table 3 .

Table 3 Rossendale Gross Employment Land Comparisons 2019-34

		B1a/b	B1c/B2	B8	TOTAL 2019- 34	Previous ELR TOTAL 2014-34
1) Experian Baseline	2019-2034 (net)	0.26	-3.15	5.67	2.78	1.36
	2019-2034 (gross)				22.97	28.29
	+ Flexibility factor				24.96	30.27
2) Regeneration / Policy On	2019-2034 (net)	0.36	-2.79	5.67	3.24	2.70
	2019-2034 (gross)				23.43	29.63
	+ Flexibility factor				25.42	31.61
3) CS Jobs Target	2019-2034 (net)	0.66	-2.20	7.25	5.71	5.79
	2019-2034 (gross)				25.90	32.71
	+ Flexibility factor				27.89	34.70
4) Labour Supply (198 dpa)	2019-2034 (net)	-0.13	-4.37	3.64	-0.86	-
	2019-2034 (gross)				19.33	-
	+ Flexibility factor				21.32	-
5) Labour Supply (210 dpa)	2019-2034 (net)	-0.15	-4.46	3.50	-1.11	-
	2019-2034 (gross)				19.08	-
	+ Flexibility factor				21.07	-
6) Past Take Up Rates	2019-2034 (net)	-2.67	-2.62		-5.29	-7.05
	2019-2034 (gross)				14.90	19.87
	+ Flexibility factor				16.89	21.86

Source: Lichfields Analysis

5.42 As can be seen from the analysis, this reduces the employment land OAN range from 22-32 hectares between 2014-2034, to between 17 ha and 25 hectares over the period 2019-34 (once again, excluding the outdated Core Strategy jobs target). This would be expected, given that the Plan period has been reduced by a quarter, whilst the OAN range has been reduced by around 23-22%.

5.43 If the Council were to continue to pursue a labour-supply-led figure of 212 dpa, this might be expected to require an employment land figure of around 21 hectares – a reduction of around 22% from the 27 hectares previously proposed.

5.44 The Council considers that it is appropriate to retain the employment land requirement of 27 hectares and the corresponding site allocations which provide the supply to meet this requirement in the Local Plan. This is in order to take account of the fact that very little employment development has come forward in the past few years. Appendix 1 provides a table of employment land completions in the period 01/04/15 to 31/03/19. This shows that a total of just over 3,322sq.m of employment land has been developed in this time, or around 0.33 ha. This falls significantly short of the requirement identified in the ELR for this period which would have been equivalent to 1.35ha per year, or 6.75ha over the five years.

5.45 Finally, and in response to the Inspectors' query on whether there are any implications for the employment OAN and employment land requirements arising from the updated employment forecasts in the SHMA 2019, Lichfields has undertaken new modelling using December 2018 Experian forecasts.

5.46 These new projections, obtained for the 2019 SHMA, indicate a net job growth of 1,100 over the period 2019-2034. This is lower than the 1,500 additional jobs forecast in the September 2019 equivalents which informed the 2017 ELR. It is probable that the lower projections reflect the short-medium term economic uncertainties surrounding Brexit at a national level.

5.47 Re-running the employment land forecasts using the latest December 2018 Experian projections which informed the SHMA Update would generate a need for 22 hectares. This is set out in Table 2. This is lower than the 25 hectares associated with the previous (higher) 2016-based Experian projections.

Table 2 Rossendale Gross Employment Land Comparisons 2019-34

		B1a/b	B1c/B 2	B8	TOTAL 2019- 34
Experian Baseline December 2018	2019-2034 (net)	0.49	-4.75	3.98	-0.28
	2019-2034 (gross)				19.92
	+ Flexibility factor				21.90

e) The Council is requested to provide information on all potential sources of employment land supply between 2014 and 2034, including completions between 2014 and 2019, outstanding commitments, surplus land within existing employment sites, supply from new employment allocations, and employment supply from mixed use allocations – and to confirm the total estimated supply figure between 2014 and 2034. The figures should be gross in order to allow direct comparison with the gross OAN figure and housing requirement figure.

[Please note, this information should be placed on the Council's website as soon as possible in order to allow representors an opportunity to digest the document and respond to the question below]

5.48 As requested this information was provided on 7th August, ahead of the full response to Matter 5, and is listed as Item [EL1.007](#) in the Examination Library. It is also reproduced in this response as Appendix 1.

5.49 Table 1 in Appendix 1 provides information on employment land completions in the period 01/04/15 to 31/03/19. It shows that a total of just over 3322sq.m (around 0.33 ha) of employment land has been developed in this time. This is made up of 324sq.m of B1c uses and a further 496sq.m of unspecified B1 uses; 1,256.35sq.m of B2 use and 1,246sq.m of B8 uses.

5.50 In relation to future supply, Table 2 in Appendix 1 shows that there is 29 ha (net developable area) of land that is: proposed for new employment; spare capacity within existing employment areas; or is additional floorspace based on sites with planning permission for new employment uses.

f) Taking account of the detailed supply information above, how does the employment land requirement compare to the amount of employment land provided for within the Plan? If the estimated supply figure exceeds the employment requirement, is the uplift justified and soundly based? Does it take account of qualitative issues and the aim to reduce out-commuting? Is the supply figure capable of being delivered, or is it intended to allow choice?

How does the employment land requirement compare to the amount of employment land provided for within the Plan?

5.51 The identified supply (of approximately 29 ha) aligns relatively closely with the employment land requirement of 27 hectares set out in the Local Plan (2014 to 2034). This allows for a margin of flexibility and includes 1.3 ha arising from new planning permissions for employment (including extensions to existing premises), which is not accounted for in the in the supply identified in the Local Plan⁴.

If the estimated supply figure exceeds the employment requirement, is the uplift justified and soundly based?

5.52 Paragraph 80 of the NPPF seeks to ensure that planning will create conditions for businesses to invest, expand and adapt, identifying wider opportunities for development. Specifically in line with Paragraph 81d of the NPPF planning policies should:

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

5.53 Commentary from local stakeholders included in the ELR identified that take-up of new employment within the Borough has been slow because of the lack of available sites. In order to compensate for this the Council is suggesting the allocation of additional land for employment particularly, though not exclusively, in the west of the Borough, as this is where the market is strongest and where access to the strategic road network is best. Allocating sites will help provide choice, especially given that some of the land identified may come forward later in the plan period.

5.54 These allocations complement the Council's Economic Development Strategy (2018 to 2033) which aims to establish the Invest in Rossendale brand to attract growth sector businesses and bring quality employment, whilst also supporting new and existing businesses. This Strategy supports the Pennine Lancashire Growth and Prosperity Plan 2016-2032, and its ambition to narrow the productivity gap with, and ensure that Pennine Lancashire contributes to the

⁴ Some of these permissions are within existing employment allocations which have not been shown to have spare capacity in the Local Plan (i.e. net developable area on these sites is 0ha). The permissions tend to be for relatively small extensions to existing buildings on sites which, when they were assessed, would not necessarily have been identified as having additional available land. The assessment will not have accounted for minor enlargement of existing buildings.

overall Lancashire economy. It notes that a “future supply of employment land in appropriate locations is essential to achieve our planned economic growth and prosperity”. The need to attract large companies in recognised growth sectors, in particular building on Rossendale’s strength in advanced manufacturing, to expand the economic base and provide better paid jobs locally is stressed.

Does it take account of qualitative issues and the aim to reduce out-commuting?

5.55 As the ELR concludes (para 9.89) Rossendale has a lack of good quality small to medium-sized industrial premises, which is suppressing demand and has restricted the availability of sites for indigenous businesses to expand. This lack of supply, combined with the lack of appropriately sized units and poor infrastructure/access serve as a deterrent to companies wishing to locate in the local authority areas. Furthermore much of the existing stock in these areas to the east in particular, around Bacup) is old and of poor quality, such as former mill buildings. Refurbishing these premises to meet modern standards is challenging and can have marginal returns for developers or landowners.

5.56 The 2011 Census shows that Rossendale experiences high levels of out-commuting with twice as many people commuting out (about 16,000, of which 9,000 people commute to Greater Manchester) compared to 7,500 people commuting in. Of the 33,000 residents in employment who live here, fewer than 17,000 both live and work in the Borough. A further feature of Rossendale’s employment market is the historically low workplace-based median weekly earnings compared with the rest of Lancashire, and that residence-based earnings tend to be higher than workplace earnings (for 2017 - £23,900 compared to £22,600).

5.57 Lichfields have recommended that re-balancing land uses within Rossendale to ensure that more, and better quality, jobs are provided could help to reverse this trend and ‘clawback’ out-commuters, reducing net out-commuting rates.

5.58 Planning permission has been granted for a B2 unit on part of the proposed allocation referenced M4 (Futures Park in Bacup) and work has started on site which will eventually enable an existing employer to expand, creating extra jobs, whilst also retaining their nearby premises too. The total floor area is 5,485 sq.m and the site area extends to 1.45 ha. As the total site area measures 4.6 ha this leaves 3.24 ha (gross) of the proposed allocation remaining for other identified mixed uses, which may include more employment (B1, B2 or B8), a hotel, various retail or leisure uses in accordance with Policy EMP6.

Is the supply figure capable of being delivered, or is it intended to allow choice?

5.59 Some of the land proposed for allocation is coming to the market relatively quickly, such as at Futures Park (Site M4) which has been a long-standing employment allocation. Due to the physical constraints to development and the locational preferences of the business community, the Council has

looked to provide allocated employment sites across the Borough but particularly in the west. This has resulted in proposing some land currently in the Green Belt for release. It is expected that delivery of such sites may come forward later in the Plan period. Therefore, the supply of employment land is allowing time for the sites to come forward and by doing so is allowing for some choice.

g) How does the level of estimated provision compare to recent rates of employment land take-up in the district?

5.60 Employment land take-up has been low in the past years, as shown by the information provided in response to question Matter 5 e).

5.61 The Employment Land Review explains that the recession and prolonged economic downturn, plus the continued uncertainty with Brexit, has significantly affected development viability in East Lancashire. A further factor that is particularly relevant to Rossendale has been identified through discussions with local commercial agents, who consider that Rossendale has experienced relatively low levels of development compared to underlying demand. This is considered to be due in part to a lack of suitable, available and deliverable land, particularly to accommodate small units which have the strongest demand.

5.62 The Study (p. 75) notes that Rossendale has physical and environmental constraints and parts of the Borough are relatively inaccessible and therefore the ELR does not anticipate an upsurge in largescale B-Class developments in the foreseeable future. Other factors affecting uptake include the general move towards a more Business Services-oriented economy, which has higher employment densities (Rossendale's employment densities are relatively low, compared to national and regional averages).

5.63 The recently introduced prior approval process to facilitate the change of use from B Class uses to residential without needing planning permission may also have an impact. Furthermore, Lichfields suggest that continuing austerity measures leading to reduced levels of public spending may make it much more difficult to deliver development on constrained brownfield sites.

5.64 Over the period 2005/06 to 2015/16, gross annual take up of B-class employment uses averaged 0.99ha (with 50% of this attributed to B2 industrial space). This compares to losses which averaged 1.35ha per year over the same period 2005/06 to 2015/16, and results in a net loss of employment space over this time period.

5.65 The Local Plan seeks to allocate 27ha of employment land. This is in order to meet Rossendale's employment space needs in full and provide a degree of flexibility to respond to unforeseen requirements going forward. This is in line with the NPPF's requirements to create the conditions in which businesses can invest, expand and adapt. As required by the NPPF (para 80), Rossendale has sought to provide a higher level of employment land than has been delivered in the recent past to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The demand forecasting undertaken in the ELR suggested an

objectively assessed need (OAN) of between 22ha and 33ha for the period 2014 to 2034. This is equivalent to between 5.5ha and 8ha every 5 years, and equates to between 1.1ha per year and 1.6ha.

5.66 RBC selected the demographic scenario which produced an OAN of 27ha over the Plan period; this equates to 1.35ha per annum.

5.67 It should be noted that some of the land which is being identified as proposed new employment land may not come forward in the first five years of the Plan period. However, by allocating the land now it is expected that work can begin on identifying the actions needed to bring the land forward for B1, B2 and B8 land uses, working with the landowners (who are willing to engage) and other parties including the Local Enterprise Partnership.

h) Is the estimated supply of surplus land on existing employment sites based on a comprehensive assessment of all existing sites?

5.68 As part of the Employment Land Review, Lichfields assessed the committed stock of employment space, which comprised 69 existing or allocated sites amounting to just over 198 ha of land (gross). An additional 51 potential future employment sites identified by RBC Officers and Lichfields were also asked to assess their suitability for employment uses. The existing employment sites were appraised in terms of their suitability based on attractiveness to the market and ability to meet future needs, as well as to identify where surplus land exists which could provide additional new employment land.

5.69 All the aforementioned sites were inspected and, in accordance with the Practice Guidance, their suitability for employment use was assessed against the following criteria:

1. Physical limitations or problems such as strategic road/local access, infrastructure, ground conditions, flood risks, pollution or contamination (where known);
2. Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
3. Appropriateness and likely market attractiveness (including vacancy and market activity on site) for the type of development proposed;
4. Proximity to labour and services;
5. Barriers to Delivery; and,
6. Environmental/amenity impacts experienced by would-be occupiers and neighbouring areas.

5.70 In addition to the above site criteria, the assessment also considered other site factors such as their policy status, planning constraints and suitability for specific uses. Although flood risk was considered as a part of this assessment, it is recognised that being in a flood zone does not necessarily preclude some types of commercial uses from coming forward for development at these employment sites.

5.71 Alongside site visits undertaken by Lichfields, the analysis was supplemented by discussions with key stakeholders such as commercial agents

and Council Officers. The assessments also reviewed data provided by RBC such as known land ownership, flood risk, constraints, call for sites and relevant planning history.

5.72 It should be noted that the assessment process in itself does not necessarily provide a complete picture of the local significance of certain sites. For example, a site could be assessed to have the potential to satisfy particular business and sector needs (i.e. which can be important reasons for retaining the site) even if it does not perform well against conventional site assessment criteria. A wider commentary was therefore provided in the ELR to supplement the formal rating exercise.

5.73 The assessment's findings are therefore considered to be robust and up to date at the point at which the work was undertaken, which was spring 2017.

i) What assumptions have been made about the proportion of employment development that will be delivered on the mixed-use allocations?

5.74 The ELR made a number of recommendations regarding existing employment sites that may be suitable for mixed use with an element of B1 office. However, the ELR noted that it was not possible at this stage to quantify the amount of B1 class employment development which would come forward as part of a mixed use scheme. Therefore, this has not been factored in to the demand and supply balance calculation.

5.75 The identified Use Classes on the mixed-use allocations used the recommendations in the Employment Land Review (Appendix 5) as a starting point and refined through Officer workshops, other studies and consultation responses. Where the site has a recent planning permission, such as M2 Spinning Point, the uses will reflect those which have been granted permission.

M1 Waterside Mill, Bacup

5.76 The Council's view is that employment generating uses are appropriate on the ground floor, and proposes A1, B1, or B2 on the ground floor, with C2 (residential) on the upper floors. Policy HS2 identifies this building for 39 residential units and 0.09 ha employment land.

5.77 The ELR recommends the site is better suited to mixed use (residential or retail-led, noting that the site is predominantly vacant, with no available land for expansion, is Grade II listed and is surrounded by residential uses. The site is considered to be more appropriate for mixed use development, with residential or retail-led conversion including a component of commercial space.

M2 Spinning Point, Rawtenstall

5.78 This is identified for a number of uses including all A-class uses, B1 business, as well as hotel and residential (with 28 units proposed under Policy HS2). The B1 element proposed in the Local Plan under Policy EMP2 is shown as being 1.56 ha. Planning consent was granted under 2017/0617 for a mixed use

development of approximately 5,000 sq.m of floor space comprising a range of town centre uses including retail, leisure, hotel and / or housing and this includes B1.

M3 Isle of Man Mill, Water

5.79 Policy EMP2 identifies this site for 0.51 ha of net developable employment area based on the existing floor space of the existing building. The ELR proposes that Isle of Man Mill is released for mixed use or residential development because it is almost fully vacant and in a remote location. Para 11.4 of the ELR reports that the site could accommodate a small B1 (a) office space as part of a wider mixed use development. Policy HS2 is proposing 16 residential units on the land adjoining the mill.

M4 Futures Park, Bacup

5.80 No figure is given for this allocation in the Local Plan as this is “to be determined as part of the masterplanning”. However, an application has recently been approved on Plot 5 (March 2019) for the *erection of industrial / manufacturing building (Use Class B2) incorporating ancillary office and storage space. Development also includes creation of service yards (with associated gates / fencing, sprinkler tank and cooling towers), parking facilities, hard and soft landscaping, access and associated works (Ref 2019/0102)*. This site is 1.35 ha (gross) and will provide 5,485m² of new manufacturing/industrial building, all falling within Use Class B2, and including ancillary office.

M5 Park Mill, Helmshore

5.81 Park Mill (0.86 ha gross/0 ha net) is recommended for release from employment to mixed use development in the ELR. It notes the site is peripheral, and adjoins residential properties to the north, east and west. The employment use of the site is diluted by alternative uses including residential and a café/tearoom. It is considered that the site should no longer be protected exclusively for employment uses. A flexible approach to any potential redevelopment of this area should be explored, for a combination of employment, residential and other uses such as retail, sui generis and leisure. As a result the site is identified for A1 and A3 uses in the emerging Local Plan.

Employment policies

j) Is the retention of all existing employment sites and sites last used for employment, as set out in Policy EMP3, justified and deliverable? In particular:

(i) Does the policy apply to new and existing employment sites which are allocated in Policy EMP2?

5.82 Yes, the policy EMP3 relating to Employment Sites and Premises applies to all the sites listed under Policy EMP2. In addition the Policy is expected to apply to all other “existing premises and sites last used for employment.”

(ii) Outside these areas, what are the benefits of the policy?

5.83 The Council considers it necessary to protect existing employment premises to secure the continuing use or redevelopment for employment of existing employment sites unless a scheme for non-employment redevelopment accords with the criteria set out in Policy EMP 3 (a) to (i). A thorough assessment has been made of all existing employment areas, as explained in the Employment Land Study.

5.84 The benefit of this is to optimise the use of employment land in the long term having regard to the shortage of suitable land for employment, the need to re-use and re-develop existing sites (so making best use of land, particularly given the constraints such as flood risk and topography that are prevalent within Rossendale), and reduce losses to the existing employment land supply.

(iii) Is criterion b deliverable where proposed redevelopment schemes involve housing provision only?

5.85 The policy states that "Proposals on all employment sites/premises for re-use or re-development other than B use class employment uses will be assessed under the following criteria:...b) The proposal does not result in a net loss of jobs". The policy goes on to say that any proposals for housing use will need to address the criteria listed above, which includes b).

5.86 It is acknowledged that, by its very nature, housing development on a site currently in employment use would mean a permanent loss of employment land and could result in the loss of jobs. However, this is only one of several criteria and the second part of the policy only asks for this to be addressed. It may be that the former employment uses on the site are relocating to another site or the employment site may not have been in active use for some time, in either case there will not be a loss of jobs. Alternatively, where it can demonstrate that the benefit of housing development does not outweigh the harm caused by the loss of jobs, the policy can support this.

(iv) Are criteria c and e adequately defined?

5.87 Criteria (c) requires proposals to be assessed according the relative quality and suitability of the site for employment whilst Criteria (e) assesses the location of the site and its relationship to other uses.

5.88 As discussed in the Explanation to the Policy although there is a need to protect sites and premises it is also recognised that some 'of the older stock may not be suitable to meet current business requirements'. It is considered that the relative quality of the site for employment uses will need to be assessed, with perhaps those sites or premises in need of repair and/or renovation being able to be taken out of employment uses, particularly in areas where suitable alternative provision is available.

5.89 The location of the site is another matter for assessment and in particular whether it is suitable given its proximity to other uses, where it may on balance

be considered that other uses (i.e. none B-class) may be better in terms of amenity or other development management criteria.

5.90 It is considered that this policy as written provides sufficient flexibility against which such schemes can be assessed in the development management process.

(v) Does the policy give sufficient recognition to biodiversity/ecology issues?

5.91 Consideration of potential biodiversity / ecological impacts would be addressed through Policy ENV4 and the Development Management. As is the case with other policies in the Plan, it is not considered to be necessary to refer to ecological impacts in every policy where this may be a consideration as it will be covered through other mechanisms. It is important that the Local Plan should be read as a whole.

(vi) Why do the demand/viability/structural assessment requirements in criteria j) to l) only apply to proposals for residential re-use?

5.92 The demand/viability/structural assessment requirements only apply to residential development as this is more likely to result in the permanent loss of employment land and the decision to grant permission for housing must therefore be supported by robust evidence that this is appropriate. This is unlike other non-residential uses which may still provide economic benefit (e.g. retail or sui-generis uses) or which can be reverted back to employment uses more readily in the future.

k) What is the definition of 'employment generating development', as set out under Policy EMP4? Does it relate to B1, B2, B8 development, or is it wider than this? Is the policy intended to apply in the countryside and Green Belt?

5.93 The definition of employment generating development is wider than just B1, B2 and B8 development and as set out within the policy text [as underlined]: "Proposals for new employment generating development...which provides for or assists with the creation of new employment opportunities, inward investment and/or secures the retention of existing employment within the Borough...".

5.94 Uses which are considered appropriate on employment sites include industrial, office, business, storage and distribution uses falling within classes B1, B2 and B8 of the Use Classes Order. Other uses which are compatible with those listed above, and which also generate employment, may be appropriate, including uses defined as being sui-generis, as well as leisure and hotel uses, and small-scale convenience retail stores to serve the locality.

5.95 The policy will apply in the countryside. The criteria as set out in the 7th bullet point refers to countryside and Green Belt but other policies specifically

relating to development in these locations will also be applied as the Local Plan should be read as a whole. For example Strategic Policy SD2 expects all new development to take place in the Urban Boundaries “except where development specifically needs to be located within a countryside location”.

Appendix 1

Rossendale Borough Council's response to Matter 5, part e) – Employment land completions and future supply

Published previously (7th August 2019) as Matter EL1.007

e) The Council is requested to provide information on all potential sources of employment land supply between 2014 and 2034, including completions between 2014 and 2019, outstanding commitments, surplus land within existing employment sites, supply from new employment allocations, and employment supply from mixed use allocations – and to confirm the total estimated supply figure between 2014 and 2034. The figures should be gross in order to allow direct comparison with the gross OAN figure and housing requirement figure.

The following tables can be found overleaf:

- Table 1: Completions of B1, B2 and B8 uses between 01/04/2014 and 31/03/2019
- Table 2: Sources of employment land supply between 2019 and 2034.

Table 2 provides a list of sites expected to provide employment land (B1, B2, B8 uses) over the Plan period 2019 to 2034. This shows that there is a net area of approximately 29 hectares made up of land within new employment allocations, spare capacity within existing employment allocations and additional floorspace identified on sites which have planning permission for new employment uses. Some of the sites with planning permission for employment uses do not fall within the employment allocations. The table provides totals for both gross and net areas but it must be noted that the gross area of existing allocations includes the entire site area which will contain existing development. In terms of future available supply therefore, the net area is the most appropriate figure to use.

Key:

PP= Planning Permission

UC = Under construction

Table 1: Completions of B1, B2 and B8 uses between 01/04/2014 and 31/03/2019 (sq. m)

	Planning Use Class					
Year of Completion	B1a	B1b	B1c	B1 (Unspecified)	B2	B8
2014/2015	0	0	0	0	64.35	0
2015/2016	0	0	0	0	0	0
2016/2017	0	0	187	0	77	242
2017/2018	0	0	0	0	664	0
2018/2019	0	0	137	496	451	1004
TOTAL (sq.m)	0	0	324	496	1256.35	1246

Table 2: Sources of employment land supply between 2019 and 2034

Employment Allocation Ref. / Planning Application Ref.	Site name	Use Class	Site Area (ha)	Allocated Net Developable Area (ha)	Current status	Planning Ref. No.	Floorspace Granted PP (sq. m.)
New Employment Allocations							
NE1	Extension to Mayfield Chicks, Ewood Bridge	B1, B2, B8	2.81	2.81	New Employment Allocation		
NE2	Land North of Hud Hey, Haslingden	B1, B2, B8	3.43	2.7	New Employment Allocation		
NE3	Carrs Industrial Estate North Extension, Haslingden	B1, B2, B8	5.67	4.84	New Employment Allocation		
NE4	Extension of New Hall Hey, Rawtenstall	B1, B2, B8	6.18	5.2	New Employment Allocation		
NE5	Baxenden Chemicals Ltd, Rising Bridge	B1, B2, B8	4.92	4.4	New Employment Allocation		
Existing Employment Allocations							
EE2	Henrietta Street	B1, B2, B8	9.9	0.56	Existing Employment with PP for B1	2018/0204	192
EE12	Large Site at Hud Hey	B1, B2, B8	7.74	1.7	Existing Employment		
EE13	Land off Manchester Road (Solomons)	B1, B2, B8	1.5	1.36	Existing Employment		
EE19	Solomon's Site	B1, B2, B8	3.14	0.8	Existing Employment		
EE23	Rosendale Motor Sales, Bury Road	B1, B2, B8	0.29	0.06	Existing Employment		
EE24	New Hall Hey	B1, B2, B8	3.66	0.1	Existing Employment with PP 3 No. industrial buildings (1 no. B2 Use Class, and 2 no. B2 / B8 Use Class)	2018/0437	3896
EE43	Warth Mill	B1, B2, B8	7.08	0.08	Existing Employment with PP and UC for B1a, B2, B8	2016/0173 201 5/02 79 201 7/01 42	1016
EE47	Station Road	B1, B2, B8	0.7	0.28	Existing Employment		
Mixed Use Allocations							
M1	Waterside Mill, Bacup	A1, B1, B2, C3	0.09	0.09	Mixed Use - vacant building		
M2	Spinning Point, Rawtenstall	A1, A2, A3, A4, A5, B1, C1, C3, D2	1.56	1.56	Mixed Use - new development		
M3	Isle of Man Mill, Water	B1, B2, B8, C3	1.13	0.51	Mixed Use - existing development		
M4	Futures Park, Bacup	A1, A3, A4, B1, B2, B8, C1, Transit	4.59	0.53	Mixed Use Allocation with existing employment and permission for B2	2019/0102	5295

Planning Allocation Ref. / Application Ref.	Site name	Use Class	Area (ha)	Net Developable Area (ha)	Current status	Planning Ref. No.	Floorspace Granted PP (sq. m.)
		site for Gypsies and Travellers					
M5	Park Mill, Helmshore	A1, A3	0.86	0.4	Mixed Use - existing development		
2018/0346	Rear Of 301 - 307a Market Street, Whitworth	B2	0.01	0.01	PP	2018/0346	74
2015/0286	Hare And Hounds, 391 Newchurch Road, Stacksteads	B1	0.01	0.01	UC	2015/0286	140
2018/0295	Acre Mill, Stone Lane Off Acre Mill Road, Stacksteads	sui generis	0.08	0.08	PP	2018/0295	760
2018/0555	Peel Street Garage, Peel Street, Cloughfold	B1(c)	0.01	0.01	UC	2018/0555	45
2014/0553	Trubend, Rockcliffe Road, Bacup	Sub-division of existing B1 unit into 4 units of B1 / or B8 use	0	0.00	UC - located within EE2	2014/0553	0
2014/0284	Unit 8, New Line Industrial Estate, The Sidings, Bacup	B2	0.01	0.01	UC - located within EE3	2014/0284	101
2015/0217	Viking Trailers Ltd, Taylor Holme Industrial Estate, Atherton Way, Stacksteads	B1(c)	0.03	0.03	UC - located within EE31	2015/0217	333
2015/0491	Viking Trailers Ltd, Taylor Holme Industrial Estate, Atherton Way, Stacksteads	B1(c)	0.02	0.02	UC - located within EE31	2015/0491	226
2017/0052	Unit A11, Cuba Industrial Estate, Bolton Road North, Edenfield	B2	0.03	0.03	PP - located within EE39	2017/0052	250
2018/0352	Reelvision Print Ltd Commerce Street, Haslingden	B1, B2, B8	0.06	0.06	PP - located within EE14	2018/0352	B8 unit- 409 New units - any B use -188
2018/0543	Warton Metals Grove Mill Commerce Street Haslingden	B1, B2, B8	0.02	0.02	PP - located within EE14	2018/0543	218
2017/0634	Grove Mill And Albion Mill, Todmorden Road, Bacup	B2	0.01	0.01	PP - located within EE1	2018/0634	52
2017/0229	Unit 4B, New Line Industrial Estate, The Sidings, Bacup	B1(c)	0.07	0.07	PP - located within EE3	2017/0229	725
2017/0539	Unit 2, New Line Industrial Estate, The Sidings, Bacup	B2	0.02	0.02	PP - located within EE3	2017/0539	225
2016/0453	Land Off Taylor Holme Industrial Estate, Atherton Way, Stacksteads	B8	0.03	0.03	UC - located within EE31	2016/0453	286
2016/0221	Land off New Hall Hey, New Hall hey Road, Rawtenstall	B2, B8	0.48	0.48	UC - located within EE24	2016/0221	4874
2018/0204	Units 2 3 Plantation Mill Market Street Bacup	B1(c)	0.02	0.02	PP - located within EE2	2018/0204	192

Planning Allocation Ref. / Planning Application Ref.	Site name	Use Class	Site Area (ha)	Net Developable Area (ha)	Current status	Planning Ref. No.	Floorspace Granted PP (sq. m.)
2018/0437	Land Off New Hall Hey New Hall Hey Road Rawtenstall	B2, B2/B8	0.4	0.4	PP - located within EE24	2018/0437	3896
2016/0173	Guideline Engineering Co, Stansfield Road, Waterfoot	B2	0.01	0.01	UC - located within EE43	2016/0173	91
2017/0142	Gemini Dispersions Ltd, Holt Mill, Holt Mill Rd, Waterfoot	B2	0.003	0.003	UC - located within EE43	2017/0142	30
Total			66.57	29.20			