

Rossendale Local Plan Examination

MATTERS, ISSUES AND QUESTIONS (MIQs)



Matter 8 – Approach to site allocations and Green Belt release

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

[Policy HS2]

Policy EMP2]

Site assessment

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

8.1 Site options were assessed in the Strategic Housing Land Availability Assessment (SHLAA) ([EB004](#)) and Employment Land Review (ELR) ([EB017](#)).

8.2 The sites in the SHLAA were identified using a variety of sources including:

- previous SHLAA sites
- Sites that came forward in previous public consultation
- Call for Development Sites 2016
- Proposals from RBC Officers
- Council owned land
- Planning history
- Brownfield Land Register

8.3 The sites assessed in the ELR were identified from:

- Core Strategy allocations
- Extant planning permissions
- RBC Officers and Lichfields (planning consultants)

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

8.4 The sites in the SHLAA 2018 were assessed for residential uses. In some cases, the use of a site as transit site for Gypsies and Travellers was also considered. The ELR 2017 appraised sites for employment uses (B1, B2 and B8) and in some instances, (and therefore not routinely), a mixed-use was considered. This was done especially for some older employment sites where a retail element would help schemes viability and unlock development potential.

8.5 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.

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

8.6 The Council believes the methodology that was used to assess sites to be robust. It was based on the Planning Practice Guidance on Housing and Economic Land Availability Assessment available at the time (published March 2014). Further information on the SHLAA methodology, including the set of criteria used, can be found in [Appendix B and Appendix D](#) of the SHLAA 2018, while the approach to the site assessment in the ELR is set out in [Appendix 2](#) of the ELR.

8.7 To inform the site selection process, the Council assessed the sites listed in the SHLAA and the ELR, together with the findings from the other studies, including the Sustainability Appraisal and the Green Belt Review, and reached its conclusions by following this approach.

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

8.8 The findings from the studies informed the site selection process. However, a planning judgement was made to identify the most suitable sites for development having regards to the spatial strategy.

8.9 The reasons for rejecting sites are set out in [EL1.02h\(ii\)](#) and [EL1.002h\(iv\)](#).

8.10 Following the consultation on the Regulation 18 stage of the Local Plan, further constraints and objections were raised, which led to the withdrawal of some sites proposed for allocation. The list of sites removed is shown in Appendix F of the Statement of Consultation 2019. Please note however that three sites have been missed from this list (HS2.104 Land south of Quarry Street, Shawforth; HS2.106 Land to the east of Tonacliffe School and HS2.109 Site of Horsefield Avenue, Tonacliffe).

8.11 In addition, the Sustainability Appraisal Addendum 2019 (submitted document [SD005.1](#)) explains why sites assessed in the SA at the Regulation 18 stage have not been proposed for allocations (please see table 3.1).

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

8.12 Yes, the evidence of the application of the sequential test and exception test is set out in the Strategic Flood Risk Assessment (submitted document [EB032](#)) and the Flood Risk incorporating Sequential test Topic Paper (Submitted document [EB033](#)).

8.13 The topography of the Borough and the location of settlements within narrow valleys mean that not all development sites could be allocated within flood zone 1. In order to meet the housing and employment requirements, alternative sites are proposed for development within flood zone 2 and 3.

8.14 The proper application of the sequential and exceptions test is evidenced by the fact the Environment Agency have no outstanding concerns or issues regarding the proposed allocations in the Local Plan.

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

8.15 Following the consultation on the Regulation 18 stage of the Local Plan, further constraints and objections were raised, which led to the withdrawal of some sites proposed for allocation. Additionally, some sites were de-selected because, on further analysis, they were considered too small to be allocated i.e. they would provide fewer than five dwellings. These sites are not necessarily unsuitable or unavailable and could come forward if they receive planning permission. The list of sites removed and the reasons for this is shown in Appendix F of the Statement of Consultation 2019 ([SD007](#)).

8.16 Please note however that three sites have been missed from this list (HS2.104 Land south of Quarry Street, Shawforth, HS2.106 Land to the east of Tonacliffe School and HS2.109 Site of Horsefield Avenue, Tonacliffe). These sites are within the existing Green Belt and the reasons for their de-selection are set out in the Green Belt Topic Paper ([EB023](#)).

8.17 In addition, the Sustainability Appraisal Addendum 2019 (submitted document [SD005.1](#)) explains why sites assessed in the SA at the Regulation 18 stage have not been proposed for allocations (please see table 3.1).

Green Belt

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

8.18 The Council considers that it has undertaken a comprehensive assessment of potential housing land within the built-up settlement area. All sites over five dwellings with planning permission have been taken into account (either as an allocation or as part of the five year housing land supply). The SHLAA 2017 ([EB004](#)) includes other sites without permission, identified from the following sources:

- Sites from the 2015 SHLAA (excluding those which had since gained permission);
- Sites proposed during the Local Plan consultation;
- Call for Development Sites process;
- Meeting with planning officers to identify sites and broad areas of search;
- Council owned land identified for release;
- Sites proposed for development by housing associations;
- Planning history (e.g. sites where planning permission had previously been applied for but which may have lapsed or been refused);
- Sites identified in the Brownfield Register

8.19 The range of sources shown demonstrates how thoroughly the Council has searched for potential land and that all reasonable steps have been taken to identify this. Furthermore, the Council has specifically focussed on the identification of as many brownfield sites as possible.

8.20 In total the SHLAA looked at 425 sites; 64 sites were excluded at stage 1 of the assessment and a further 7 were already completed by the time of the final stages of the assessment, leaving 354 sites.

8.21 153 out of the 354 sites that were assessed as part of the SHLAA were located in the urban boundary. Table 2 in Annex 1 of the Housing Topic Paper 2019 [EB006](#) shows that out of 6,422 dwellings which could potentially be accommodated on land assessed as part of the SHLAA, 1,243 of these (or 19%) were located within the existing urban boundary.

8.22 The site selection process prioritised housing allocations situated within the Urban Boundary as far as possible. However, the number of sites identified as deliverable or developable through the SHLAA (and according to findings from other studies such as Strategic Flood Risk Assessment, Landscape Assessment, Heritage Assessment and Viability Study) was not enough to meet the local housing need for the Borough.

8.23 Table 1 below provides a summary of the locations of the housing / mixed use¹ allocations identified in the emerging Local Plan (as updated to 01/04/19). This is based on the existing location, rather than the proposed location which would amend the existing urban boundary.

Table 1: Summary of locations of Local Plan housing allocations

	Urban Boundary	Countryside	Green Belt	Total
No. of allocation sites	51	19	5	75*
% of sites	68%	25%	7%	100%
No. of dwellings	1,321	936	521	2,778
% of dwellings	48%	33%	19%	100%

*Does not include H53 or H67 as these were complete as of 01/04/19; both of these sites were in the urban boundary

¹ Mixed use allocations with an element of residential use included

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

8.24 The density of development on brownfield sites has been maximised as much as possible to reduce the need to allocate greenfield sites. The density of development on the 23 proposed brownfield allocations ranges from between 28 to 550 dwellings per hectare (dph). This gives an average density on these sites of approximately 100 dph with the median figure being 53 dph. This is higher than the average density of the brownfield sites proposed in the draft (Regulation 18) version of the Plan, which was approximately 90 dwellings per hectare.

8.25 The same number of mixed greenfield/brownfield sites is proposed as in the draft version of the Local Plan (8 sites). Again, the density has been maximised wherever possible and especially if the site is close to good public transport connections. The average density of development on these sites has slightly increased from 29 to 34 dwellings per hectare, since the draft version of the Local Plan.

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

8.26 Yes. Details of the discussions which have taken place between the Council and neighbouring authorities are set out in the 2019 Duty to Cooperate and draft Statement of Common Ground document ([SD008](#)). This demonstrates that no neighbouring authority was able to take any of Rossendale's housing need and vice versa. Neighbouring authorities also confirmed through the Duty to Cooperate that they agreed with Rossendale's approach to identifying their Housing Market Area and meeting their own housing needs in full within their own administrative boundaries.

j) What methodology has been applied in the Green Belt Review (2016), and is it soundly based? Does the assessment process give sufficient recognition to the strategic role that some sites play in preventing the unrestricted sprawl of Manchester (purpose 1a and 1b)? Is the framework for assessing harm, based on the existence of one 'strong' score (rather than the number of strong/medium scores), robust and appropriate?

What methodology has been applied in the Green Belt Review (2016), and is it soundly based?

8.27 In the absence of definitive national guidance on how to undertake Green Belt studies, a method statement was drawn-up based on national planning policy and good practice guidance, relevant case law and information collated on the context and background of the Rossendale Green Belt (see Chapter 2 of Submission Document [EB022](#)). The studies were prepared by LUC who have a long track record of delivering robust and transparent assessments of Green Belt land across the country. LUC have completed Green Belt studies for over 40 local authorities and their approach has been found sound at Local Plan Examinations.

8.28 Consultation was carried out on the method statement with Duty to Co-operate partners before any assessment work was carried out. The consultation revealed that there was agreement on the proposed methodology (see Chapter 3 of Submission Document EB022).

8.29 The study provides an assessment of the relative performance of the **contribution** of the Green Belt within the Borough to the five NPPF Green Belt purposes. It then goes on to assess what areas of land could result in lower levels of **harm** to the Green Belt if they were released from the Green Belt. Chapter 3 of Submission Document EB022 sets out the framework used to undertake the study.

8.30 In summary, the methodology involved three key steps:

1) **The Borough was divided into a number of parcels for assessment.**

Two types of land parcel were identified: a) smaller parcels adjacent to the built up areas. b) broad areas of Green Belt that may be more remote from large built up areas and main settlements. The justification for this approach is set out in Chapter 3 of the Submission Document EB022.

2) **Assessment of contribution** - Each parcel was assessed for the contribution it makes to the NPPF Green Belt purposes using clearly defined criteria. The detailed rationale behind the assessment criteria is set out in Chapter 3 of the Submission Document EB022. The assessment of parcels and broad areas against each of the purposes 1-4 did not apply any predetermined weighting to any of the four factors. In addition, given that there is no guidance on what constitutes an overall 'strong' contribution to Green Belt, no presumptions were made as to how multiple lower ratings equate to single high ratings. Therefore, each parcel's score against each of the Green Belt purposes was carefully recorded so that the contribution of all parcels against all purposes could be examined.

3) **Assessment of Harm** – A further, more detailed assessment of the harm of releasing Green Belt land was undertaken for parcels which did not make 'strong' contribution to any one Green Belt purpose. In addition, where parcels made a 'strong' or 'moderate' contribution to any one Green Belt purpose, consideration was given as to whether any sub-areas within the parcel that may, if released, result in less harm to the Green Belt, could be identified. The more detailed assessment of harm considered:

- How the parcels or sub-areas perform against the Green Belt purposes.
- The potential implications of removing the parcel or sub-parcel from the Green Belt on neighbouring land and the integrity of the wider Green Belt.
- Any boundary issues associated with the removal of the land from the Green Belt.

8.31 The assessment concludes with a summary considering which parcels should be retained as Green Belt and which, either as a whole or in part, could potentially be considered for release. Other sustainability and viability issues affecting decisions regarding proposals for Green Belt release have been the subject of separate consideration by the Council.

8.32 Following agreement of the method statement, LUC carried out a preliminary desk-based assessment, followed by site visits. Visiting all identified Green Belt parcels allowed judgements made remotely to be verified and allowed

for new judgements to be made associated for the assessment criteria that could not be assessed remotely. The site visits were also used to collect geo-referenced photographs illustrating the overall character and appearance of the Green Belt, together with any key issues such as the strength of boundaries, land uses or visual prominence of adjoining settlements.

8.33 It is clearly reported in the study (for example paragraph 5.7 of Submission Document EB022) that the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Submission document EB023 titled the 'Green Belt Topic Paper' sets out the Council's full exceptional circumstances case.

Does the assessment process give sufficient recognition to the strategic role that some sites play in preventing the unrestricted sprawl of Manchester (purpose 1a and 1b)?

8.34 Yes. Paragraphs 3.20 to 3.28 of Submission Document EB022 define the key terms and features used to assess the contribution of Green Belt to Purpose 1. The detailed assessment criteria used to assess contribution to Purpose 1 are set out in Table 2.1.

8.35 These assessment criteria are consistent with those used in the Greater Manchester Green Belt Study, which defined the large built-up area as the visible continuous urban mass that stretches across all of the 10 metropolitan authority areas. As Rossendale does not have a large built-up area, it is only those parcels within Rossendale that abut the 'large built-up area' of Greater Manchester have been considered under Purpose 1 for this study. This includes parcels that lie adjacent to the built-up areas of Stubbins, Edenfield and Whitworth.

8.36 Table 4.3 records the findings of the contribution assessment and likely harm of releasing each Green Belt parcel. Commentary on how the parcels and sub-areas perform against the Green Belt purposes, the implications of release on neighbouring Green Belt and any associated boundary issues is included in Table 4.4 and Appendix 4.1.

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

8.37 Yes. Paragraphs 3.54 and 3.55 in Submission Document EB022 highlight that there is no guidance on what constitutes an overall 'strong' contribution to Green Belt. Professional judgement was applied in using the agreed assessment criteria set out in the Chapter 3 study to arrive at contribution ratings for each individual Green Belt purpose, but no presumptions were made as to how multiple lower ratings equate to single high ratings.

8.38 The study reports that it would not be unreasonable to assume that a parcel that rates highly against a number of different purposes potentially has more value in Green Belt terms than one which rates highly against only one purpose, and mapping was therefore included in Chapter 4 of the study to illustrate this (showing parcels coloured according to the highest strength of contribution and shaded according to the number of purposes making that

strength of contribution); however this was not a definitive statement on the potential harm to of the Green Belt if the parcels were to be release.

8.39 Table 4.2 in Submission Document EB022 clearly reports the framework for assessing harm. The table is supported by paragraph 4.7 which states that the NPPF does not require all the purposes of Green Belt to be met simultaneously and a strong rating against any Green Belt purpose could be sufficient, on its own, to indicate an important contribution and therefore high harm to the Green Belt should the land be released. Table 4.3 records the findings of the contribution assessment and likely harm of releasing each Green Belt parcel.

8.40 Importantly (as noted above), the presence or otherwise of one 'strong' rating does not form a threshold above which the potential for release of land within a parcel is not considered further. Consideration was given to whether any sub-areas within strongly-contributing parcels might, by playing a less important role as Green Belt, potentially be released with less harm to the Green Belt purposes. The parcels where sub-areas are identified are listed in Table 4.3. Commentaries on how the parcels and sub-areas perform against the Green Belt purposes, the implications of release on neighbouring Green Belt and any associated boundary issues are included in Table 4.4 and Appendix 4.1. Parcels with the potential for a high degree of harm, and for which no sub-areas were identified, are not considered in Table 4.4 or Appendix 4.1.

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

How have the conclusions of the Green Belt Review informed the Local Plan?

8.41 The Green Belt review conclusions informed the site selection process when it became evident that there was an insufficient number of suitable sites situated within the Urban Boundary or within the countryside adjoining the Urban Boundary to meet the objectively assessed need for housing and employment.

8.42 Parcels (or sub-areas within parcels) which were identified for potential release in the study were considered for potential development sites. The findings of other studies including the Strategic Flood Risk Assessment, Heritage Impact Assessment, Landscape Study were also considered.

8.43 For new employment sites, development was also considered on parcels or sub-areas not identified for release. This was a result of the strategic vision of providing employment sites along the M66 / A56 corridor.

8.44 The Green Belt Topic Paper (submission document EB023) provides further information on how the Green Belt Review was considered when selecting sites for allocation.

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

8.45 The reasons behind the choice of Green Belt release locations are set out in the Green Belt Topic Paper ([EB023](#)). The Green Belt parcels situated at the edge of settlements are considered to enable a sustainable pattern of development. Of the 8 proposed Green Belt release site, 4 are wholly or partly on previously developed land (H69 – Cowm water treatment works, Whitworth; H70 – Irwell Vale Mill; H71- Land east of Market Street, Edenfield and H74- Edenwood Mill, Edenfield).The remaining 4 sites on greenfield land are situated in proximity to local bus routes.

8.46 The large Green Belt release site at H72, land west of Market Street, Edenfield, in particular is considered to provide an opportunity to create a high quality, well-designed scheme which will result in a sustainable development with enhanced bus services, improved education provision and the provision of affordable housing.

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

8.47 The exceptional circumstances which are considered to exist for the release of Green Belt for housing and employment development are set out in the Green Belt Topic Paper ([EB023](#)). This concludes that the importance of having a balanced housing and employment supply in a District with challenging geography and viability issues in the east of the Borough has influenced the approach to release of Green Belt land. In employment terms the A56 corridor is key to attracting new businesses but many potential sites are constrained by Green Belt. In order to provide sites that meet the Borough’s employment land requirement it has therefore been necessary, following analysis, to consider the release of Green Belt sites.

8.48 The exceptional circumstances are re-iterated in the explanatory text for Strategic Policy SD2 (Urban Boundary and Green Belt). 5 housing allocations are proposed on existing Green Belt land, comprising of 29.07 ha (gross) or 17.10 ha (net developable area); 3 new employment areas are proposed comprising 12.42 ha (gross) or 10.71 ha (net).

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

8.49 While preparing the emerging Local Plan, Green Belt boundaries have been reviewed to accommodate the Borough’s future growth and to ensure the boundaries are clearly defined, easily recognisable and permanent. As well as the main proposed Green Belt releases to allow for housing and employment

allocations, a number of minor amendments have been proposed to the existing Green Belt boundary. These have occurred as a result of the tidying up of cartographic errors and acknowledging where new development has taken place. For example, in some cases, boundaries have been redrawn to exclude land which, due to development or change which has taken place since the Green Belt was first designated, no longer meets the criteria for Green Belt. In other cases, the boundary has been altered to ensure it follows a permanent or clear feature such as a road, watercourse or established field boundary.

8.46 It should be noted that not all changes will result in the loss of Green Belt, some result in an addition, particularly where the boundaries have been changed to reflect existing physical features.

8.47 The justification for this is considered to come from paragraph 139 of the NPPF, which sets out a number of criteria which should be followed when reviewing Green Belt Boundaries. The two most relevant criteria state in this case state that "When defining Green Belt boundaries, plans should:

- not include land which it is not necessary to keep permanently open;
- define boundaries clearly, using physical features that are easily recognisable and likely to be permanent."

8.48 As stated in EL1.002d, the Council consulted widely on proposed minor changes to the Green Belt and Urban Boundary whilst preparing the Local Plan Part 2 (Site Allocations and Development Management Policies DPD). Although Part 2 was eventually withdrawn, the evidence from the previous consultation was still considered relevant and used to inform the Green Belt review for the emerging Local Plan.

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

8.49 The intention of this policy criteria is to minimise any impact that release of the Green Belt in these locations has on the remaining Green Belt. The Council believes that this is consistent with the spirit of national policy, but in any event the Council believes it has made best use of the sites that have been allocated within the Green Belt

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

8.50 This requirement is considered to be justified as it reflects paragraph 138 of NPPF which states "...Where it has been concluded that it is necessary to release Green Belt land for development, plans...should also set out ways in which the impact of removing land from the Green Belt can be offset through

compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.

8.51 With reference to table 3.16 of the Local Plan Viability Assessment (EB019) viability testing has been undertaken to model the impact of developer contributions towards offsite open space provision /improvements and also contributions towards new playing pitches. In the context of the housing sites identified in SD2 the impact of compensatory developer contributions has been modelled based on an amount of £1,366 per dwelling, with a further sum of £566 per dwelling tested in relation to playing pitch contributions. Assuming that compensatory improvements are recovered in this way then the Viability Testing shows that these contributions will have an impact on viability.

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

8.52 Yes. However, the Council decided not to adopt this approach. The Council’s objective was to minimise, as far as possible, the release of Green Belt land and the designation of safeguarded land would have undermined that objective.

Allocation policies

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

8.53 The boundaries of the site allocations are shown on the Local Plan Policies Map available on the Council’s website as a pdf and on an interactive map. Question 9 of the Inspector’s Preliminary Questions asked the Council to provide addresses for each allocation and these were set out in Appendix 4 of the response ([EL1.002b\(v\)](#)). If the Inspector deems it to be appropriate, the Local Plan can be amended to include site addresses within the tables in HS2 and EMP2. The Council would propose to do this as a minor modification

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

8.54 The housing density figures in Table 1 are based on the net developable area. Further detail on how the net developable area and the number of units proposed on each site was identified is set out in sections 5.1 - 5.11 of the response to Question 13 of the Inspector’s Preliminary Questions ([EL1.002j\(i\)](#)).

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

8.55 Detailed site allocation policies have been provided for H72 (in policy HS3), H13 (HS4), H5 (in Policy HS5), M4 (EMP6) and NE4 (EMP7) as these are relatively large sites for the Borough and/or have particular issues which need to be taken into consideration in order to achieve an acceptable development. These are considered to be exceptional to the standard considerations for most applications and require a detailed policy to ensure they are being adequately addressed. Examples include the need to prepare a phased masterplan, the provision of infrastructure such as education and taking account of particularly sensitive heritage or landscape settings.

8.56 For other allocations, site specific requirements will be dealt with through the Development Management process. However, if the Inspector deems it to be appropriate, further detail could be provided on those sites without guidance if certain issues or constraints are considered to necessitate specific guidance. This could include a site plan and a brief summary of considerations such as the need to address flood risk, access, open space and landscape considerations. These could be prepared for relevant sites as a Main Modification and can be informed by the further information being provided in Matters 9 to 15.

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

8.57 Sites of 50 dwellings or more are considered to represent large scale development in Rossendale which is a relatively small, predominantly rural borough. Policy HS2 therefore expects sites of this size to prepare a Masterplan in order to provide a comprehensive approach to development. There are relatively few sites of this size and the Council will adopt a pragmatic approach in requesting this and/or the level of detail required. This is considered to be a reasonable approach with the intention that a Masterplan will be beneficial for both the Council and the developer in addressing issues early in the process and in reaching a mutually agreeable approach.

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

8.58 EMP2 expects a masterplan or development brief for sites NE2, NE3, NE4 and M4. NE4 and M4 both have specific policies (EMP6 and 7) which set out issues to be addressed within these documents. However the other two sites do not have additional guidance on what might be required in a masterplan or brief.

8.59 However, if the Inspector deems it to be appropriate, further detail could be provided on the other sites if certain issues or constraints on them are deemed to necessitate specific guidance. These could be prepared for relevant sites as a Main Modification and can be informed by the further information being provided in Matter 15.

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

8.60 The identified B-Use Classes on the employment allocations have been informed by the recommendations of the Employment Land Review (ELR) 2017 ([EB017](#)), which carried out an assessment of the characteristics and quality of existing and allocated employment sites and their suitability to meet future employment development needs. In particular [Appendix 5](#) of this report sets out the details of the recommended uses.

8.61 As set out in Section 10 of the ELR, sites were inspected and, in accordance with the PPG², their suitability for employment use was assessed against the following criteria:

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

8.62 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.

8.63 Alongside site visits, 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.

8.64 The assessment served a number of purposes and part of this was a summary of potential future uses for each site which were reflected in EMP2.

8.65 It is not considered that office development is only appropriate within the identified centres in the Development Hierarchy. Office proposals will be dealt with on their merits in accordance with local and national policy.

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

² PPG Housing and economic needs assessment – at the time of the study, this was the version first published in March 2015; it has since been updated in 2018 and 2019

8.66 The identified Use Classes on the mixed-use allocations have been identified through the recommendations in the Employment Land Review (Appendix 5) but may have been further 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.

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

8.67 The 2019 Local Plan Viability Assessment (VA), prepared by Keppie Massie, has not tested each site individually. Rather, it has followed the advice set out in PPG on Viability (at July 2018) which states that "Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies".

8.68 The VA has grouped the allocations into typologies according to criteria such as number of dwellings, type of land (such as greenfield/brownfield), characteristics of the site and by location. In addition to the generic testing a specific viability assessment has been prepared in relation to a broad range of "case study" sites comprising the larger allocations. The sample of case study sites comprises greenfield, mixed and brownfield sites which range in capacity from 45 to 400 dwellings. The sample is sufficiently wide to provide a viability framework for all larger sites above 50 dwellings that are likely to come forward over the plan period.

8.69 The VA has tested the site allocations against the expected policy requirements set out in the Local Plan, such as those relating to the provision of affordable housing and open space. It has not made an assessment of the implications of site specific issues such as physical constraints on site or particular mitigation measures.

8.70 In preparing the assessment of residential sites, the VA made certain assumptions in relation to the form of development and the variables against which to test the sites. Given the diverse character of the property market in Rossendale, the VA acknowledges that the data would not fit all eventualities and every site has its own particular characteristics. However, with the benefit of Keppie Massie's professional experience and knowledge, the approach and assumptions made are considered to represent the most reasonable methodology.