



HEARING STATEMENT – MATTER 2 VISUAL AND SPATIAL STRATEGY

ROSSENDALE LOCAL PLAN EXAMINATION

TAYLOR WIMPEY (UK) LTD

Date: August 2019

Pegasus Reference: (KW/GL/MAN.0299/R005)

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APPENDIX 1 – ROSSENDALE CONSTRAINTS PLAN- TOPOGRAPHY & FLOOD RISK

2. INTRODUCTION

2.1 Pegasus Group have been instructed on behalf of their client, Taylor Wimpey (UK) Ltd, to prepare Hearing Statements to the Rossendale Local Plan Examination (EiP) in support of their land interests in the Borough. This relates to the following sites, which are both allocated in the submitted plan:

- Land west of Market Street, Edenfield (within Housing Allocation H72); and
- Grane Village, Helmsore (within Housing Allocation H74).

2.2 This Statement deals with Matter 2 'Vision and Spatial Strategy' which addresses the following issue:

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

3. MATTER 2: QUESTION A – VISION AND STRATEGIC PRIORITIES

[Policy SS, Policy SD1, Policy SD2]

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

- 3.1 Paragraph 15 of the NPPF notes how succinct and up-to-date plans should provide a positive vision for the future of each area. Plans should also be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively in a way that is aspirational but deliverable.
- 3.2 Whilst we note that the submitted Local Plan does not have an overarching vision statement like many other Local Plans do, the Plan does clearly articulate Rossendale’s strategic priorities under the ‘key topics’ section.
- 3.3 We therefore consider that the plan does clearly articulate a vision and the strategic priorities of the Borough, in accordance with national policy.

4. MATTER 2: QUESTION B – POLICY SS - OVERALL SPATIAL STRATEGY

[Policy SS, Policy SD1, Policy SD2]

b) What is the basis for the overall spatial strategy, as set out in Policy SS, which seeks to focus growth and investment in Key Service Centres, on major sites and on well located brownfield sites? Is the strategy and distribution justified and sustainable? What other strategies were considered, and why were they discounted?

- 4.1 Taylor Wimpey fully support the overall spatial strategy of the Plan, which is justified, sustainable and represents an appropriate combination of a 'top down' and 'bottom up' approach to allocating sites. This combined approach is necessary given the constraints of the Borough and in order to ensure that emerging development requirements are met.
- 4.2 Paragraph 20 of the NPPF confirms that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing, employment, retail development etc. To achieve this, the Spatial Strategy starts with the 'top down' approach to delivering sustainable development, by directing development towards settlements which are identified as the most sustainable in terms of services and facilities. We are fully supportive of this approach, and in particular of the identification of Haslingden as a Key Service Centre and Helmshore as an Urban Local Service Centre. Both settlements have a number of local services and facilities and are sustainable settlements which can sustainably accommodate higher levels of growth in the future.
- 4.3 However, as identified in the Council's housing topic paper and land supply documentation, there is simply insufficient land within the urban areas to deliver Rossendale's development requirements alone. Paragraph 4.2.10 of the Housing Topic Paper 2019 **(EB006)** notes the following (our emphasis):
- "Sites situated within the Urban Boundary were prioritised for housing allocations. However, the number of sites identified as being deliverable or developable for housing based on the SHLAA and other studies such as the SFRA, Landscape Assessment, Heritage Impact Assessment, Green Belt Review and Viability Study was not enough to meet the local housing need for the Borough. Therefore, housing allocations are proposed for sites currently within the countryside and the Green Belt with changes proposed to the Urban Boundary and the Green Belt to allow for future development."*
- 4.4 Whilst, therefore, in an ideal world the spatial strategy would look to allocate all sites within the urban boundaries and within high performing settlements identified within the settlement hierarchy, this has not been possible due to insufficient land being available.
- 4.5 This can be seen on the plans over the page, with the first showing all the sites that were considered during the SHLAA process and those that were selected at the Regulation 19 stage, and the second showing the key constraints in the Borough, namely topography and flood risk (with Edenfield marked in red).

Fig 4.1 – Extract of (EL1002e.v) Location of Assessed Housing Sites Plan

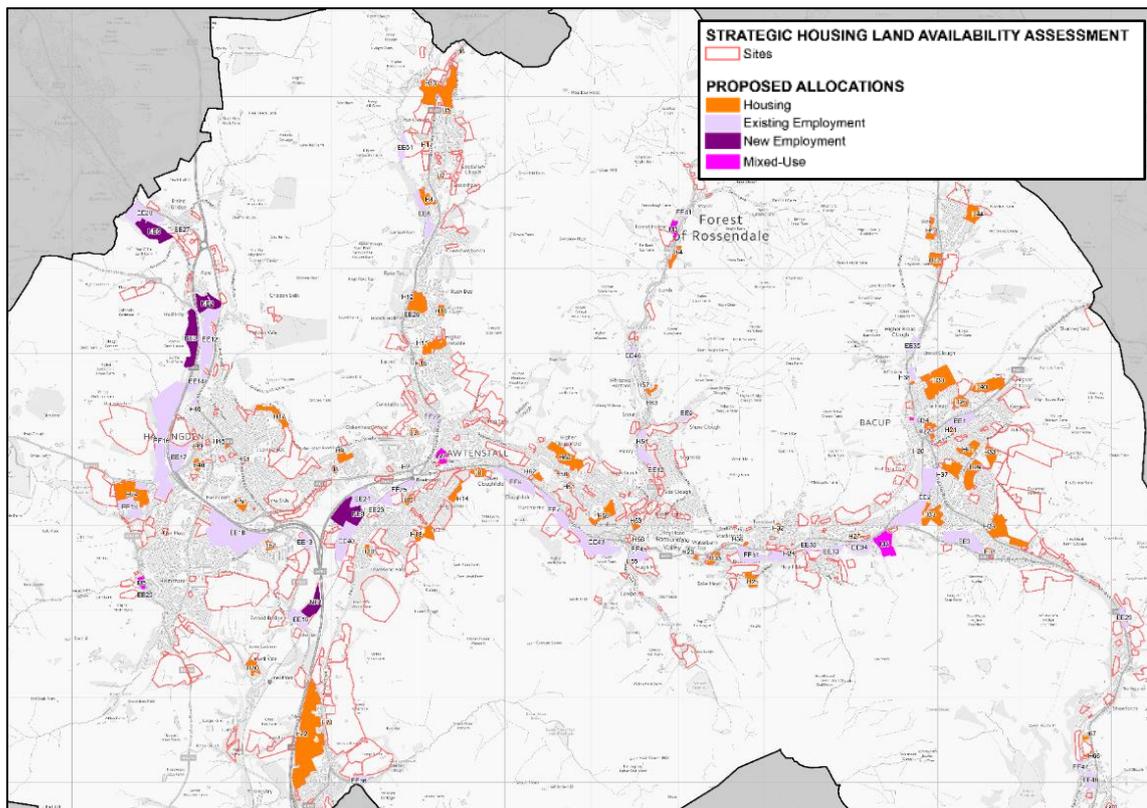
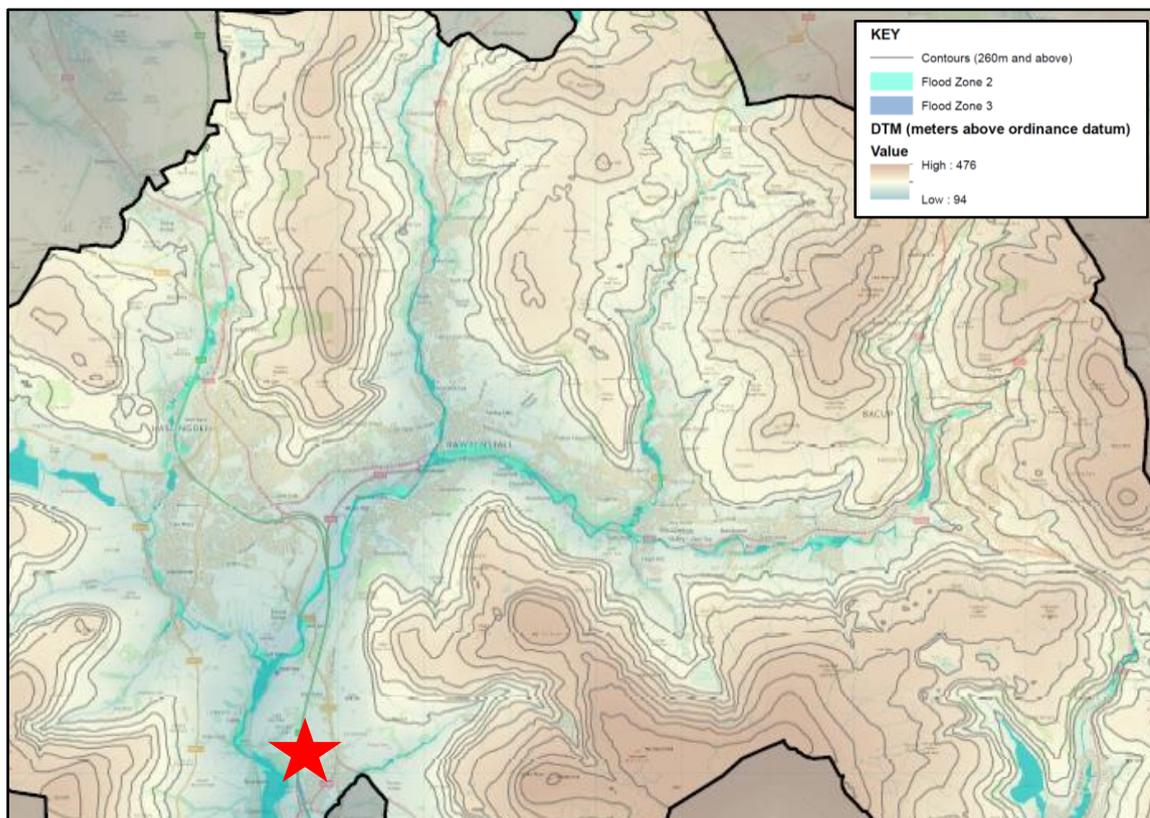


Fig 4.2 – Extract from Rossendale Constraints Plan – Topography and Flood Risk (see Appendix 1)



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- 4.6 This demonstrates the limited amount of land within Rossendale that is suitable for development, with over half the land over 260m (where the contours on the plan start), and much of this on steep slopes; whilst large areas of lower lying land fall within Flood Zones 2 and 3.
- 4.7 It is evident that the existing settlement pattern has developed along the narrow valley floors at relatively high density and led to several settlements merging into one another (for example Rawtenstall, Reedsholme, Crawshawbooth, Goodshaw and Love Clough are all joined together in a spur heading northwards).
- 4.8 When this existing development is combined with topography and flood risk constraints, it is clear that remaining capacity within the Borough is limited (to the areas shown in light blue/ green), and as such the pool of sites to select from is small, and is simply unable to meet the Borough's needs via the 'top down' approach alone.
- 4.9 The overall plan of allocated sites does show a good distribution of sites throughout the borough, with the large Edenfield allocation (H72) being relatively well connected to the two large urban areas of Rawtenstall and Haslingden, which form a broadly contiguous urban area (see our **Matter 14 Statement** for more detail on this). Indeed the vast majority of the large allocations are either adjacent to or well connected to the Key Settlements of Haslingden, Rawtenstall and Bacup.
- 4.10 The Council's Strategy Topic Paper (**EB001**) succinctly summarises this issue, stating:
- "The distribution of development indicates the challenges of allocating new housing land because of the limited availability of land in already densely built up urban areas"*
- 4.11 Due to this lack of available land, the spatial strategy has therefore also had to allocate major sites, such as Edenfield, utilising a 'bottom up' approach. This approach identified major sites which are suitable, deliverable and viable to deliver development. We are fully supportive of such an approach, and it is fully justified given that these sites will provide a very important contribution to delivering the development requirements of Rossendale as a whole. Without such major sites, the Local Plan would simply be unable to deliver its spatial strategy and identified development requirements, a particularly critical issue in the Rossendale context given the concerns we raise about housing need and land supply (please refer to our **Matter 3** and **Matter 19 Statements**).
- 4.12 It is clear that the Council has not taken the matter of releasing Green Belt sites such as Edenfield lightly, however it is necessary given that the staged approach to allocating sites failed to identify the quantum of land necessary to meet emerging development needs. The Housing Topic Paper 2019 (**EB006**) confirms the staged approach which has been undertaken by the Council, which first considers brownfield land within identified settlements (which aligns with paragraph 118 of the NPPF), with paragraph 4.2.7 noting the following:
- "Due to the constraints associated with developing brownfield sites, which include viability, flood risk and land contamination, the proportion of allocated brownfield sites for housing is relatively low at 30%".*
-

- 4.13 As such the Council's approach to establishing a spatial strategy for Rossendale is justified. They have focused on urban capacity in existing settlements and brownfield first, an exercise which has yielded an insufficient quantum of land. The Council have therefore proceeded to identified major site allocations which help to fill this gap and can help to deliver Plan's development requirements.
- 4.14 Overall therefore, the spatial strategy is entirely justified, consistent with national policy and positively prepared (in line with paragraph 35 of the NPPF).

5. MATTER 2: QUESTION C – DEVELOPMENT HIERARCHY

c) Are the settlement groupings in the Development Hierarchy soundly based and supported by robust evidence? In particular:

i) Should Rawtenstall be identified in a different category to the other Key Service Centres?

5.1 No comment.

ii) What category does Edenfield fall under?

5.2 Whilst Edenfield is not identified in a particular category within the spatial strategy, the Council's Strategy Topic Paper (**EB001**) indicates that it is a Local Service Centre. Namely, Appendix 1 of the Paper states that Edenfield is a Level 3 category, on the same level as Helmshore, Stacksteads and Rising Bridge. Category 3 settlements are listed as having the key characteristics of a Local Parade or more than one shop, good quality bus services, primary schools and playing fields.

5.3 Edenfield therefore falls under category c) of the Spatial Strategy, however it is understandable as to why the policy does not currently list it in the hierarchy given that the Edenfield allocation (H72) is a major allocated site.

iii) Does the hierarchy capture all other relevant settlements in Rossendale?

5.4 Yes, as it appears to capture all the settlements which are due to receive growth, or are subject of policies in the plan.

iv) How do the settlement groupings fit with the Retail Hierarchy in Policy R1?

5.5 The settlement and retail hierarchies are not exactly aligned within the plan, with several local service centres not having defined retail centres, but this is not unusual with retail centres building up historically in certain locations (market towns etc) and serving multiple settlements.

5.6 The general scale of the defined retail centres does align with the settlement hierarchy, with the Rawtenstall Town Centre, and Bacup and Haslingden District Centres at the top, with the Local Centres and Neighbourhood Parades generally located within smaller service centres.

6. MATTER 2: QUESTION D – SPATIAL DISTRIBUTION

d) Is the predicted distribution of growth in line with the spatial strategy? To what extent is development focused on Key Service Centres rather than Major Sites? Does it represent an appropriate balance between locational sustainability, and other strategic factors and priorities?

- 6.1 Table 1 of the Councils Response to **(EL1.002k)** outlines the spatial distribution of housing and employment development across the Borough, broken down by its position in the settlement hierarchy. Looking purely at housing distribution in relation to Key Service Centres and Major Sites, the spatial distribution is as follows¹:
- Bacup: 22 % (681 dwellings);
 - Haslingden: 5% (150 dwellings);
 - Rawtenstall: 14% (423 dwellings); and
 - Whitworth: 6% (188 dwellings).
- 6.2 Housing Growth in the 4 Key Service Centres therefore equates to an overall total of **47%** of the committed and planned housing growth in the Plan. Conversely, Edenfield, which is the only major site allocation (H72) for housing, equates to 13% of the overall planned housing growth. When including the other Green Belt release site of Edenwood Mill (H73), this equates to **15%**.
- 6.3 We would also reiterate, as we have throughout our submissions that whilst the Grane Village site technically falls within the ward of Helmshore (with Grane Road itself forming the ward boundary); in reality it is more closely related to the larger settlement of Haslingden. This is because, whilst Haslingden and Helmshore are practically equidistant from the site, Haslingden has a greater level of facilities, particularly in terms of retail and healthcare services, and Grane Road provides a direct main road link to those facilities. Therefore, future residents of the Grane Village site will be more likely to use the shops and services in Haslingden than Helmshore, and as such this site is considered as an extension to Haslingden.
- 6.4 If the Grane Village scheme is included in Haslingden it would boost its proportion of distribution to 10.6% and the overall growth in the Key Service Centres to over 50%.
- 6.5 It is clear therefore that development is still very much focused towards Key Service Centres, in line with the Spatial Strategy, as opposed to Major Sites.
- 6.6 Furthermore, the Council's table also reveals that growth is generally distributed in accordance with the Spatial Strategy in other aspects too. The Urban Local Service Centres will accommodate 22% growth, the rural local service centres 12%, smaller villages 2% and other areas 2%.

¹ Percentage figures calculated from the 3,046-dwelling figure from the Council's table, which is planned growth and existing commitments and therefore excludes windfall.

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- 6.7 Therefore, the predicted distribution of growth is very much in line with the overall spatial strategy, which seeks to focus growth towards the Key Service Centres first, then to the Major Sites, Urban Local Service Centres, Rural Local Service Centres and then towards other areas.
- 6.8 The spatial distribution of growth also strikes an appropriate balance in terms of locational sustainability but also in light of the constraints which are present in the Borough. Council Strategy Paper (**EB001**) summarises this matter clearly, noting that:
- "The need to facilitate new development also needs to be set against taking as sustainable approach as possible that respects the setting of the Borough and its essential character of valley settlements surrounded by hills."*
- "The Plan aims to achieve this balance by focussing development in Key and Local Service Centres and defined major sites."*
- 6.9 **EB001** also notes how the distribution of development is reflective of other constraints, for example in Rawtenstall in particular, it is extremely difficult to gain access to land on the periphery of the settlement. For Bacup, the high level of housing allocations here is reflective of a number of factors, including availability of land. It is however noted that in this area, levels of viability are not as high as in the western parts of the Borough.
- 6.10 Therefore, viability is another strategic factor which has been carefully considered and weighed up by the Council. Financial viability is stronger in the southern and western areas of Rossendale, including in Edenfield, hence why a major site (H72) has been allocated here to try and deliver a balanced housing market and encourage more aspirational family housing, providing choice and liquidity in the local market.
- 6.11 Overall, therefore, given the combination of factors that the local authority must take into consideration in a constrained Borough, the spatial strategy is effective, justified and positively prepared (in line with paragraph 35 of the NPPF).

7. MATTER 2: QUESTION E – DETERMINING MAJOR SITES

e) What strategic factors/priorities were key in determining the Major Sites?

- 7.1 This is for the Council to clarify, however as we have explained above, viability and the need to deliver a balanced housing market across the Borough are key factors which have clearly influenced the site allocation process for Major Sites.
- 7.2 We are wholly supportive of this approach, and indeed the Council’s justification for allocating the Edenfield (H72) site within its ‘Appendix 1- Site Overview Document for Proposed Allocations’ **(EL1.002e.ii):**

“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 (see also Green Belt Topic Paper for further details). It is considered that this site plays an important role in contributing to a balanced housing supply in the following ways:

- It is located in the popular south west of the Borough where there is high demand.*
- Given the substantial number of houses proposed in the East of the Borough the site helps to ensure a balanced supply between the east and west of the Borough*
- The site is large enough to ensure a mix of housing types and sizes, including affordable provision in an area of the Borough where affordability ratios are highest.”*

8. MATTER 2: QUESTION F – SPATIAL APPROACH TO GREEN BELT

f) To what extent does the spatial strategy seek to focus development on non-Green Belt sites in the countryside rather than Green Belt land?

8.1 It is clear from the Council’s 2019 Housing Topic Paper (**EB006**) that the spatial strategy has focused on allocating non-Green Belt sites in the countryside first, before Green Belt land release has been considered.

8.2 **EB006** notes how 68% of the sites proposed for housing allocation are currently situated within the Urban Boundary. This is followed by 26% of sites in the countryside and then 6% Green Belt. Table 9 of **EB006** provides the detailed breakdown of allocated sites in the Plan.

Table 9: Summary of housing allocations within the Urban Boundary, countryside and Green Belt

Housing Site Allocations (Regulation 19)	Total	Urban Boundary	Countryside	Green Belt
Number of allocation sites	77	52	20	5
% of sites	100%	68%	26%	6%

8.3 The Council has therefore ensured that the spatial strategy is in line with national policy; focusing on land within the urban boundary first, then the Countryside and finally the Green Belt.

8.4 The Council has therefore fully examined all other reasonable options before allocating Green Belt release sites. The test outlined in paragraph 137 of the NPPF has therefore been satisfied.

9. MATTER 2: QUESTION G – FLOOD RISK

g) How has flood risk been factored into decisions about the spatial strategy and distribution of growth?

- 9.1 This is for the Council to clarify on this, however, we can confirm that both Taylor Wimpey's interests within the H72 (Edenfield) and H74 (Grane Village) allocations are entirely within Flood Zone 1, and therefore at low risk from flooding.

10. MATTER 2: QUESTION H – POLICY SS – DISTRIBUTION OF GROWTH

h) Does Policy SS provide sufficient clarity on the degree of concentration and the distribution of growth?

- 10.1 We have no particular comments on this matter, the policy is sufficiently clear in terms of the hierarchical approach to the distribution of growth, as well as allocating major sites to ensure overall development requirements are met.

11. MATTER 2: QUESTION I – POLICY SS - USE IN PLANNING APPLICATIONS

i) Is Policy SS also intended to be used to determine individual planning applications? In this context are the constraints relating to the scale of growth in Urban Local Service Centres, Rural Local Service Centres and Other Places robustly based and adequately defined? Would the policy allow effective re-use of brownfield sites in sustainable village locations?

- 11.1 It is unclear whether this policy is to be used to determine individual applications, but if it is, we would suggest the constraints and criteria for determining an acceptable scale of growth within the different settlement tiers need to be better defined.
- 11.2 The policy does seem to prioritise brownfield growth (on well located sites) across all tiers of the hierarchy, although again, it is not completely clear.

12. MATTER 2: QUESTION J – POLICY SD2 - DEVELOPMENT IN COUNTRYSIDE

j) Is the approach to development in the countryside, as set out in the first paragraph of Policy SD2, justified? What type of development needs to be in a countryside location?

12.1 We have concerns with the current wording of the opening paragraph of Policy SD2. The wording is as follows:

"All new development in the Borough will take place within the Urban Boundaries, defined on the Policies Map, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area."

12.2 Paragraph 78 of the NPPF notes how in order to promote sustainable development in rural areas, planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

12.3 We consider the current wording of Policy SD2 to be inconsistent with this aim, as it is too restrictive and is not sufficiently clear as to what type of development needs to be located within the countryside. Presumably this would mean agricultural uses, however the NPPF is clear that there is a need to sustain rural communities and local services.

12.4 This includes the need for rural housing, with NPPF paragraph 77 noting that planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs; and consider whether allowing some market housing on these sites would help to facilitate this.

12.5 Therefore, the wording of SD2 is overly restrictive. The wording should either be amended to be more in line with national policy or provide more clarity on exactly what forms of development will be considered as acceptable within the designated countryside.

13. MATTER 2: QUESTION K – URBAN BOUNDARIES

k) Are the Urban Boundaries clearly defined and robustly based? Are the proposed boundary changes to reflect existing development on the ground, provide defensible edges and correct errors, as set out in document EL1.002d, justified?

- 13.1 We have no particular comments on this matter, other than it is clear that the amended Urban Boundary for Edenfield, which now includes the H72 Edenfield allocation, is clearly defined and robustly based.
- 13.2 The revised western boundary for Edenfield is formed by the A56, existing built form is located to the east and south and Blackburn Road to the north. All boundaries are therefore clearly defined, robustly based and also alleviate concerns regarding encroachment and urban sprawl into the surrounding Green Belt and Countryside.
- 13.3 Taylor Wimpey also fully support the proposed urban boundary changes for Helmshore. Their Grane Village housing site (H74) is incorporated into the revised urban boundary, with Holcombe Road and Grane Road providing strong and clearly defined boundaries. Existing built form is located to the south and east, therefore the clearly defined boundaries on all four sides are robust and alleviate concerns regarding urban sprawl into the surrounding countryside.
- 13.4 Taylor Wimpey therefore fully support the proposed changes to the urban boundaries of Edenfield and Helmshore, which are clearly defined and robustly based.

14. MATTER 2: QUESTION L – COMMUTING PATTERNS

I) To what extent does the Plan seek to reduce out-commuting and promote greater self-containment? Is a significant shift in commuting patterns attainable?

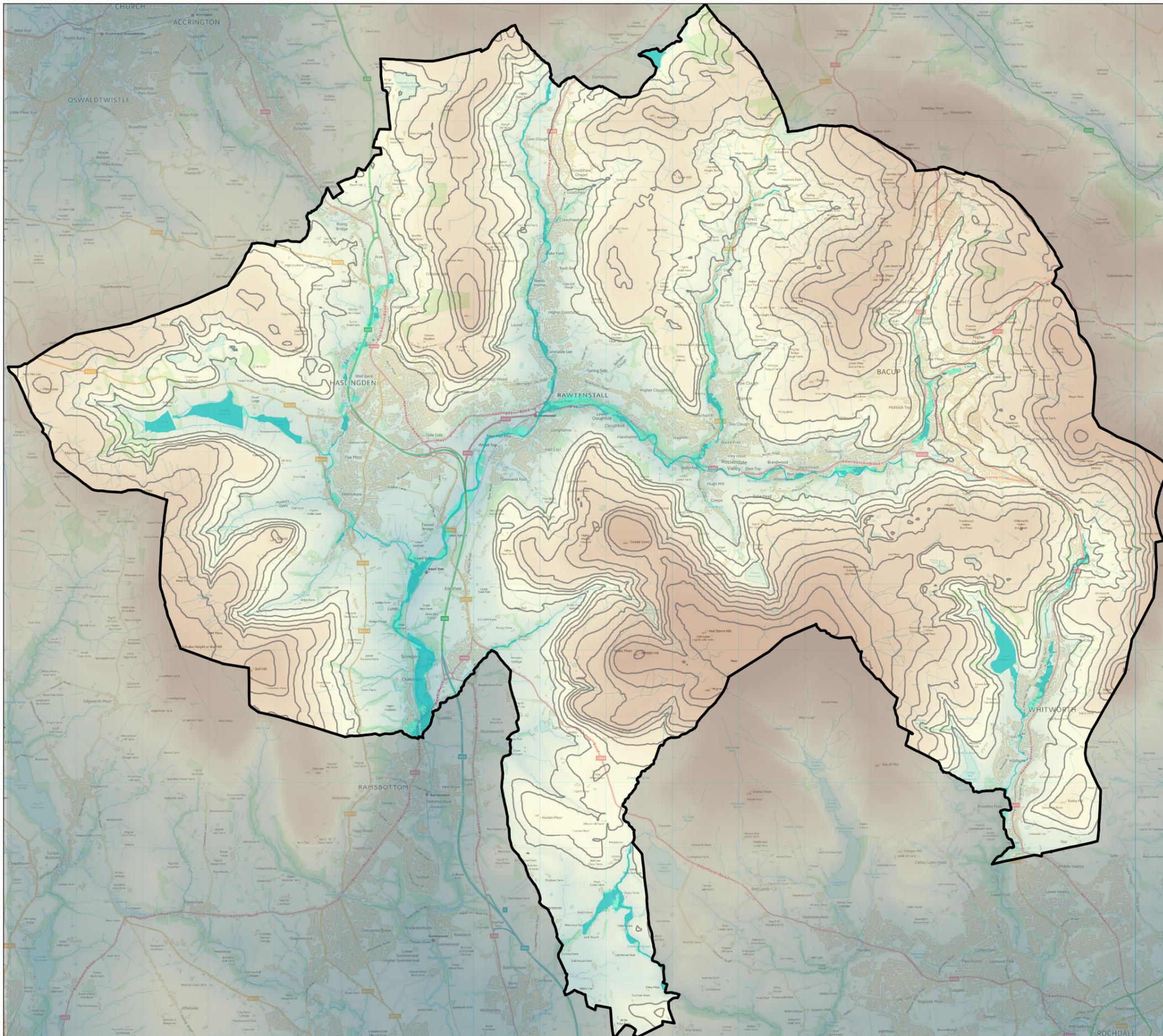
- 14.1 We address this matter in more in our Matter 3 Statement, but also summarise here.
- 14.2 Rossendale is considered to have a containment level of 61% which is below the 70% threshold recommended for a Housing Market Area, however this is comparable to several other locations and geographies in this area, reflecting the nature of this location on the fringe of Greater Manchester.
- 14.3 The most effective way of reducing out commuting is ensuring that housing and employment needs are aligned to ensure that workers are not forced to commute for suitable housing, and vice versa.
- 14.4 In the case of Rossendale, our analysis suggests that the housing requirement currently proposed does not support the economic growth aspirations of the plan and should be uplifted to correct this, and reduce out commuting.

15. MATTER 2: QUESTION M – POLICY SD1 - SUSTAINABLE DEVELOPMENT

m) Does Policy SD1 adequately reflect the presumption in favour of sustainable development?

- 15.1 Yes, the wording of Policy SD1 is consistent with the wording of paragraph 11 of the NPPF, which outlines the presumption in favour of sustainable development. Taylor Wimpey therefore fully support Policy SD1.

APPENDIX 1 – ROSSENDALE CONSTRAINTS PLAN- TOPOGRAPHY & FLOOD RISK



KEY

- Contours (260m and above)
- Flood Zone 2
- Flood Zone 3

DTM (meters above ordnance datum)

Value

- High : 476
- Low : 94

Revisions:
First Issue- 29/08/2019 EH

Edensfield, Rossendale

MAN.0299

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