

**Local Plan Examination Inspector's Matters, Issues** and Questions

**Matter 19 – Housing Supply and Delivery** 

**Hearing Statement** 

**Peter Brett Associates** 

August 2019

On Behalf of Hurstwood Holdings



Hearing Statement on Behalf of Hurstwood Holdings



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COMMENTS



## 1 INTRODUCTION

- 1.1 This Hearing Statement has been produced by Peter Brett Associates (now part of Stantec) on behalf of Hustwood Holdings, and is submitted to the Examination of the new Rossendale Local Plan 2019 2034.
- Over recent years Hurstwood Holdings has been promoting various sites in Rossendale for residential development through the ongoing consultation process on the new Local Plan, including land at Hurst Lane, Johnny Barn Close and Union Road. In June 2013, in response to the Green Belt and Urban Boundary Review consultation, we submitted a range of detailed development framework reports setting out how these sites could be sustainably delivered to provide much-needed new housing in the Borough.
- 1.3 In September 2015 we submitted further comments to the 'Local Plan Part 2: Site Allocations and Development Management Policies' document. This document was then abandoned in favour of the production of a new Local Plan. Accordingly, in October 2017 we submitted comments as part of the last round of consultation on the new Local Plan. We also then submitted further comments on behalf of Hurstwood Holdings in October 2018 in relation to the pre-submission version of the draft Rossendale Local Plan.
- 1.4 In parallel with the production of the new Local Plan, we have also held a number of meetings with the Council and submitted two planning applications for the sites at Hurst Lane and Johnny Barn Close. The land at Hurst Lane has since been granted planning permission for two dwellings (Ref: 2015/0308, dated 22 June 2017), and the land at Johnny Barn Close has outline planning permission for 30 dwellings (Ref: 2015/0517, dated 2 July 2018). The latter is currently part of proposed housing allocation H60.
- 1.5 More recently, we have also engaged with the Council on the Union Road site via the formal pre-application process, and a meeting was held with the Council in February 2019 in relation to this site (Ref: 2018/0063/PREAPP). A draft layout plan depicting how a residential scheme could be accommodated within this site is enclosed at Appendix A. Over the past few years we have been instructed to undertake various technical assessments of the Union Road site in preparation for a forthcoming planning application – these include a Landscape and Visual Assessment, Flood Risk Assessment and Transport Statement). Although the application was never formally submitted given the continued designation of the land within the Green Belt, these reports confirm that (i) the site is suitable and sustainable for residential development, (ii) the site can be removed from the Green Belt without offending any of the five 'purposes' set out at paragraph 134 of the National Planning Policy Framework (NPPF), and (iii) the development of this site can be achieved without any significant landscape impact. Should the Inspector decide it would be useful to have sight of these documents we would be pleased to provide them upon request.

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- Our client has therefore consistently engaged with the Council and Local Plan process at every appropriate juncture, and accordingly submit these further comments and confirm our intention to participate in the formal Local Plan Examination process.
- 1.7 For the avoidance of doubt, in this Statement we have intentionally only referred to the specific issues and questions that we wish to comment on and draw to the attention of the Inspector.



## **2 OUR COMMENTS**

### Matter 19 - Housing Supply and Delivery

Does the Plan identify sufficient land to enable the housing requirement of 3,180 dwellings to be delivered over the Plan period?

- 2.1 We are concerned by the lack of any non-delivery or 'slippage' allowance in relation to both allocations and commitments. Delivery on sites can slip for any number of reasons, and some proposed schemes will not come forward at all. We therefore suggest that an evidenced-based allowance for non-delivery/slippage should be included, having regard to past performance, and that additional land is allocated (such as the site at Union Road) to ensure a more flexible supply of deliverable housing land is available to take account of non-delivery and slippage.
- We are also unconvinced that the Council has undertaken a sufficiently comprehensive assessment of potential housing capacity within the built-up settlement areas. For example, an obvious omission is the Heritage Arcade site on Bacup Road in Rawtenstall Town Centre. The site currently comprises three long-term redundant and/or vacant buildings, namely the Heritage Arcade and former Zazu and Vogue nightclubs. Hurstwood Holdings has extensively marketed these sites for various uses including retail, office and leisure, for a prolonged period of time, and has struggled to find any suitable long-term occupiers. In particular, all attempts to market the main Heritage Arcade building have produced no actionable results and building has now been empty for over ten years. We have engaged with the Council via the formal pre-application process regarding the proposed redevelopment of the site for residential uses (Ref: 2017/0080/PREAPP), and so the local authority is well aware that the site is available and being actively promoted for residential development.
- 2.3 A range of options have been considered, including (1) total demolition and new build, and (2) façade retention with new build behind. The proposals comprise circa. 40 apartments together with new secure parking and on-site amenity space. Given that the existing buildings are located within a conservation area and adjacent to listed buildings, as part of this process we have also engaged with Historic England who have inspected the site and provided formal feedback supporting the 'façade retention' option in principle, subject to some amendments to the design. These comments, together with draft plans, are enclosed with our submission. Our client is in the process of working up revised plans and we anticipate an application will be forthcoming shortly.
- 2.4 These plans offer an exciting new opportunity to revitalise this key gateway site into Rawtenstall Town Centre, and will complement the adjacent Spinning Point regeneration scheme which will deliver new office, leisure and retail space. We consider that together these schemes will breathe new life into the town centre and act as a catalyst for change that will enhance the vitality and viability of Rawtenstall.

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- 2.5 The proposal fully aligns with the thrust of both adopted and emerging planning policy. The Council has made it clear that the regeneration of Rawtenstall Town Centre is a key priority, and work is already underway to enhance the town centre in the form of the Spinning Point development. The site is located in a prominent gateway location adjacent to the Spinning Point scheme, and has the potential to significantly enhance this part of the town centre and complement current regeneration initiatives. A new residential development in this location will increase town centre footfall and provide an injection of activity to help stimulate the local economy and provide patronage for the new retail and leisure facilities proposed at Spinning Point. The scheme will maximise the use of previously developed land in this highly sustainable location, while delivering much needed new housing that will contribute towards meeting local needs.
- 2.6 This represents a golden opportunity to rejuvenate a key gateway site within the conservation area, adjacent to a new flagship Council scheme, with the potential to support further regeneration and enhancements to the wider town centre. We therefore consider that the site is capable of making a genuine contribution towards the housing supply in a highly sustainable Town centre location, and should be formally identified in the new Local Plan as an allocated development opportunity site for residential uses. This omission in itself demonstrates that the Council has not necessarily assessed all known urban capacity options.



## APPENDIX A UNION ROAD - INITIAL PLANS





## APPENDIX B HERITAGE ARCADE – INITIAL PLANS AND HISTORIC ENGLAND COMMENTS







Image | \$ 2 Spinning Point Development Visualisations

# Proposal Design Rationale

- Retained facades, both the former Cinema and 'Vogue' nightclub.
- 2 Glazed link and facade acts as a subsidiary building element to delineate old from new whilst also pronouncing the retained facades.
- 3 Existing principle entrances retained \$ re-used as lobby entrances.
- 4 Existing window openings reused.
- (5) Contrasting top floor, set back akin to neighboring Bacup Road Mill conversion (see image 3).
- 6 New elements of side and rear facades to echo the adjacent Spinning Point development (see images 1 \$ 2).

# Proposed Eastern Elevation



Proposed Isometric Sketch of Proposal Northern & Eastern Elevations (NTS)

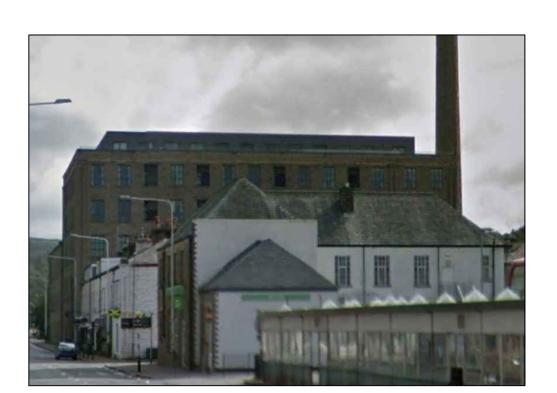
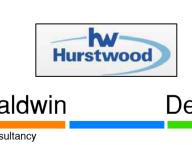
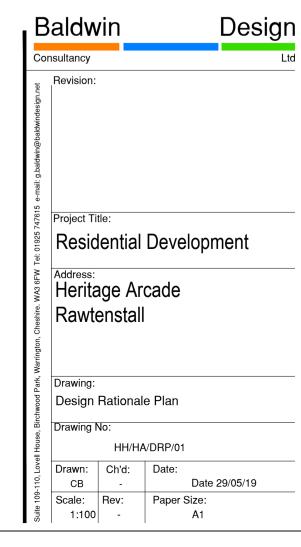


Image 3 - Bacup Road Mill conversion with top floor set back







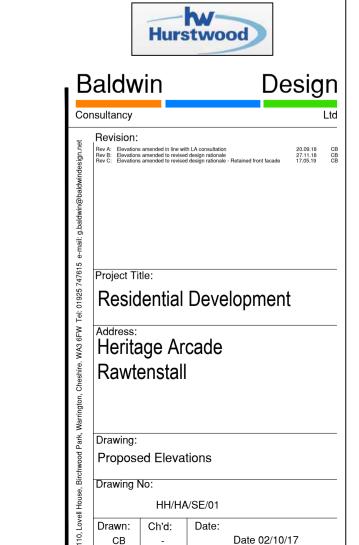






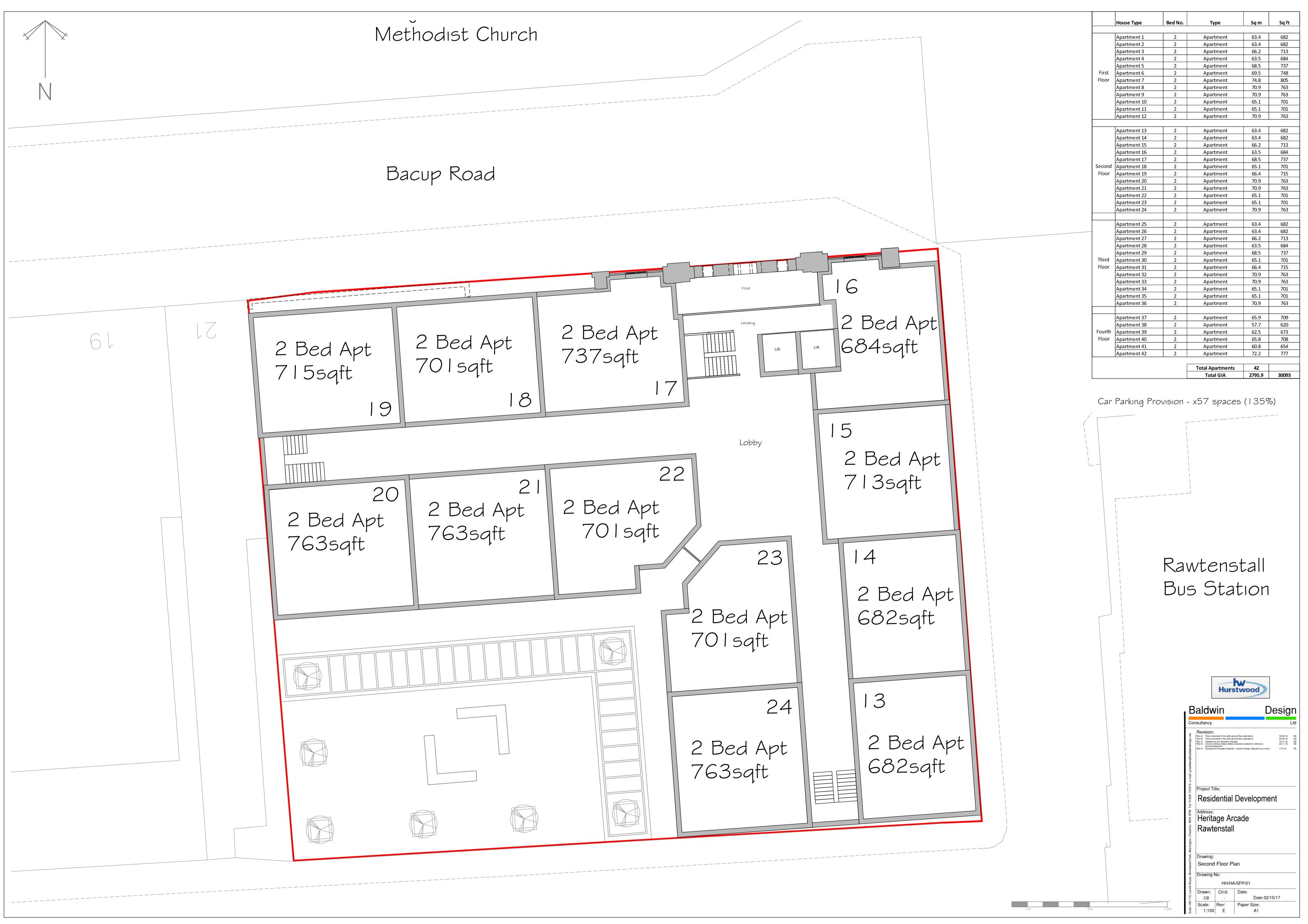


Proposed Isometric Sketch of Proposal Northern & Eastern Elevations (NTS)















Mr Michael Gilbert Peter Brett Associates Direct Dial:

Our ref: PA01004060

16 August 2019

Dear Mr Gilbert

#### **Pre-application Advice**

#### 23-27 BACUP ROAD, RAWTENSTALL, LANCASHIRE, BB4 7NG

Thank you for consulting Historic England on this proposed re-development at the above.

Rawtenstall Town Centre Conservation Area includes the various historic components typically associated with a former mill town. The town developed principally as a centre for the textile industry and retains many well preserved historic buildings and streets dating from its growth during the 18th and 19th century. This includes a strong core of stone-built commercial and institutional buildings, former mills upon which the town derived its wealth, churches and high status town houses, cemetery and cricket field and numerous terraced workers houses on the fringes of the town. It includes many buildings of considerable architectural quality and some well-preserved historic floorscapes. The town retains a clear network of historic streets defined by consistent building lines and sense of enclosure.

Bacup Road, in particular contains a number of fine listed and unlisted buildings which form a characterful townscape that is important to the significance of the conservation area. The delightful art-deco "Picture House" cinema and distinctive former billiard hall next door contribute greatly to this historic context and occupy a significant proportion of the Bacup Road frontage. The Cinema, which was converted to become the "Heritage Arcade" in the 1990s, in particular is highly prominent within the conservation area.

The proposal is for the re-development of the former cinema and billiard hall site for residential development. Two options have been prepared, one involving the entire demolition of buildings on the site and the other for the retention of the Bacup Road facades and redevelopment of the site behind. We welcome the proposed redevelopment of site, bearing in mind that it has remained vacant or under-used for some considerable time. Other re-development within the surrounding area is helping to catalyse regeneration and this site provides an opportunity to continue this enhancement of the conservation area.



Stonewall

SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW



We would recommend that the site be re-developed in a way that retains and adapts historic buildings, recognising the key role they play in the character and appearance of the conservation area. Their demolition would be a major loss to the townscape character and integrity of historic environment along Bacup Road and would seriously erode the significance, character and appearance of the conservation area.

However, we do appreciate the difficulties in re-using the former cinema building. Given the long-term vacancy and the fact that much of the building behind the front façade is fairly utilitarian a case could be made for its partial demolition. However, the delightful faience art-deco frontage onto Bacup Road has a highly distinctive character and makes a valuable contribution to the streetscape.

While we do not normally favour façade retention, in this case we think it would not be inappropriate given that this is an intrinsic aspect of the building's construction, whereby the decorative tiled front elevation and building to the rear are architecturally distinct from one another. We would therefore recommend that the cinema frontage is retained in its entirety. Ideally its entrance could be designed into a new scheme to perform the same function within the new development. To the rear a new residential block could be constructed, perhaps with a residential courtyard and with a new residential frontage to re-animate the prominent east elevation. The varied character of Option 1 in a local brick could work well if re-designed to sensitively integrate the cinema frontage.

With regard to the former billiard hall, this is another characterful building that again makes an important contribution to the street frontage. By this we refer to the whole building, not just the front elevation, including its chimnied gable and roof, which all appear to be as originally constructed. We therefore recommend that the whole building is retained and integrated within the re-development. The retention of both buildings has the potential to create a much more attractive and appealing development combining new and old buildings, thereby enhancing the character and appearance of the conservation area.

The scale of the proposals would need to be sensitive to the form, scale and character of the frontage and the townscape character of the conservation area as a whole. The current proposals, in which just the facades are retained, would subsume the frontage within a rather overbearing glassy structure and this would cause harm to the conservation area. We would not support the option to demolish and re-build because of the harmful impact this would have on the conservation area. Bearing in mind the recent retention and re-use of the former Town Hall nearby we would encourage a similar approach be employed here.

There are special duties in relation to conservation areas under section 72 of the 1990 Act. This is reinforced within the NPPF, which states that great weight should be given







to the conservation of heritage assets (NPPF 193) and that harm to the significance of the heritage asset is avoided wherever possible (NPPF190). Account should also be given to the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation (NPPF 192). We consider that this scheme has potential to accord with these requirements if the existing historic buildings on the site are retained as outlined above.

We, therefore, welcome the re-development proposals in principle but recommend that the scheme is re-considered to retain historic buildings at the site as described in this letter.

I hope this advice is of assistance and please contact me if you wish to discuss the proposals further.

Yours sincerely

David James Inspector of Historic Buildings and Areas E-mail:

# 23-27 BACUP ROAD, RAWTENSTALL, LANCASHIRE, BB4 7NG Pre-application Advice

Information Provided
Option 1 and 2 schemes
Heritage Statement dated January 2019
Building Inspection Report dated May 2018



