Rossendale
BOROUGH COUNCIL

SCHEDULE OF ACTIONS MATTER 8 APPROACH TO SITE ALLOCATIONS AND GREEN BELT RELEASE (Actions 8.3 AND 8.4)

Identification of Site Density / Optimisation of Density

8.3	**Check how the density of sites was identified and if this is net or gross (with particular reference to comments on density provided in Hearing Statements)**
8.4	**Provide additional evidence to show how the Council optimised density on sites, with reference to policy HS7 and the list of allocated sites**

1   Introduction

1.2   This note has been prepared by Rossendale Borough Council in response to these questions asked by the Inspector during the Examination Hearing on Matter 8 (Approach to Site Allocations and Green Belt Release), held on the 26th September 2019. This is specifically in relation to housing allocations and relates to the number of dwellings per hectare (dph) identified for each site. Please note that any figures quoted below are based on the dwelling numbers / net areas set out in the submission version of the Local Plan[1].

2   Identification of site density (Action 8.3)

2.1   The housing density figures for the proposed housing allocations set out in Table 1 of emerging Local Plan Policy HS1 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 set out in sections 5.1 - 5.11 of the response to Question 13 of the Inspector's Preliminary Questions (EL1.002j(i)). However, for ease of reference, this is reproduced below with some additional information to aid clarity.

2.2   The capacity identified on the proposed allocations either relates to the number of dwellings granted through a planning permission (where applicable) or is an estimate based on an appropriate density for the site in question. In arriving at these densities, Officers have taken into account locational and sustainability factors, including local character and specific knowledge of the site. However, the capacities identified do not preclude densities being increased on sites, subject to a detailed planning proposal being submitted. Nor does it mean that the densities envisaged within the assessment would be appropriate and these would need to be assessed through the normal planning process when submitting a planning application.

2.3   As the SHLAA indicates, the initial list of sites for consideration came from a wide variety of sources, including Call for Sites, previously identified sites and sites identified by analysing broad areas of search. The boundaries of these potential sites were plotted, resulting in the identification of a gross site area.

2.4   For each potential site, the SHLAA identified key information including: location, type of land (i.e. greenfield, brownfield or mixed), current land uses / designations and physical

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[1] Taking account of the change to the net developable area of H72, Land west of Market Street, Edenfield which should be 13.74ha

constraints. Site characteristics were considered which could have the potential to reduce the area available for built development. These include:

- Woodland or mature trees (especially trees protected by a Tree Preservation Order)
- Steep slopes
- Flood Zone 3 or zone at high risk of surface water flooding
- Health and Safety Executive inner and middle consultation zones
- Culvert
- Watercourses, ponds or reservoirs
- Allotment gardens
- Graveyard / burial ground
- Active play areas, playgrounds and Multi User Game Area (MUGA)
- Biological Heritage Sites, Lancashire Ecological Network Core Area: the specific area of land covered by a "Stepping Stone" was excluded if they covered only part of the site; if they covered the whole or a large part of the site the area available for development was reduced by 50% to allow protection of part of the habitat);
- Electricity sub-station, high-pressure gas pipeline, electricity pylons
- Areas in active use e.g. as a car park
- Existing dwellings/farmhouses/private gardens within the site (unless landowner expressed the wish to demolish the dwelling or develop its garden)
- If landowner / developer expressed interest in only developing part of the site

2.5   For those sites which included any of these constraints, the next stage was to exclude the part of the site which was considered to be affected. Broadly speaking, this involved reducing the gross site area by the specific amount of land covered by the constraint or, where this could not be clearly identified e.g. for large areas of biodiversity/habitat, a percentage of exclusion was applied.

2.6   The remaining area of the site available for development was measured to produce an initial site area available for development.

2.7   This area was then reduced further to take account of the area of land which may be given over to uses beyond the typical allowance for gardens, access roads etc. This included land for larger roads, infrastructure, open spaces serving a wider area, major landscaping and so on. This was dependent on the size of the site, as follows:

- Area of site available for development below 0.4ha: 100% of the site identified as developable area;
- Area of site available for development between 0.4ha and 2ha: 90% of the site identified as developable area;
- Area of site available for development over 2ha: 75% of the site identified as developable area

2.8   In the initial stages, once the net developable area resulting from this had been calculated, a standard density was applied (i.e. a number of dwellings per hectare multiplied by the net developable area). This was usually 30 dwellings per hectare, unless a higher density was felt to be more appropriate due to the specific site characteristics, such as where the site involved conversion of a mill building or was located within the town centre.

2.9   For certain sites, the potential yield (also referred to as capacity or number of dwellings) generated through this exercise was again refined based on further assessment and consultation. Following the Regulation 18 consultation in particular, the density of

development on brownfield sites was maximised as much as possible to reduce the need to allocate greenfield sites. This generated an average density on brownfield sites of approximately 100 dwellings per hectare.

2.10 Other reasons for amending site yield included responses to comments from the Heritage Impact Assessment, Landscape Assessment, other consultees such as Lancashire County Council (LCC) Highways and landowner preferences. If any further information was available, for example if the landowner or site promoter had produced an indicative site layout, this was also taken into account.

2.11 For sites without planning permission, the densities identified in the Housing Site Allocations table have been generated by either applying a standard density multiplier (e.g. net developable area x 30dph) or by dividing the number of dwellings considered most appropriate for the site by the net developable area. In the latter case, it is acknowledged that parts of the site identified as "developable" may not actually be developed but it has not been possible to specify exactly how much, or where, this undeveloped land is. For example, the desire to minimise an effect on the setting of a heritage or landscape asset has meant that the number of dwellings has been reduced but the exact area or location of the land to be set aside has not been identified. This may result in what appears to be a relatively low density. Some further details on sites where this may apply is set out in Table 1 below. Please note that the sizes and capacities quoted are taken from the Submission (Regulation 19) version of the Local Plan.

Table 1: Proposed allocations with relatively low densities

Housing Allocation Ref.	Site name	Gross Area (Ha)	Net developable area (Ha)	No. of dwellings	Net density	Comments
H26	Land off Greensnook Lane, Bacup	1.43	1.43	26	18	The site has planning permission so the density is already established.
H40	Land off Todmorden Road, Bacup	3.95	2.98	53	18	The Landscape Study for this site states that the north west part of the site is not suitable for development. Whilst this area is included in the net developable area, the intention is that this area would not be developed; the Heritage Impact Assessment for the middle section of the site also suggested that the number of dwellings should be reduced; these considerations have had the effect of reducing the overall number of dwellings proposed on the site, although some of the site will remain undeveloped – this then produces what appears to be a low density.
H60	Johnny Barn Farm and land to the east, Cloughfold	5.18	4.55	80	18	The north-western part of the site already has outline permission for 30 dwellings; the remainder of the site has a proposed capacity of 50. The number of dwellings on this part of the site is relatively low due to the Heritage Impact Assessment conclusion which stated that the number of dwellings on the site should be "reduced from 105, possibly reducing below 50".

Housing Allocation Ref.	Site name	Gross Area (Ha)	Net developable area (Ha)	No. of dwellings	Net density	Comments
H44	Irwell Springs, Weir	2.48	2.48	46	19	The site has planning permission so the density is already established
H9	Land off Oaklands and Lower Cribden Avenue	1.57	1.57	31	20	The site has planning permission so the density is already established
H18	Carr Barn and Carr Farm	2.15	1.24	25	20	Due to the site's sensitivity in relation to landscape and heritage, the density of the site has been reduced. For example, the site is situated to the south of two Grade II listed assets, therefore a low density would reduce the impact on the setting of the heritage assets. Also, the landscape study recommends planting to break up the housing layout and reduce overall impact – again this has the effect of reducing density.
H33	Land off Rockcliffe Road and Moorlands Terrace, Bacup	4.00	3.22	63	20	Part of the site has planning permission for 26 dwellings and is under construction. The remaining part of the site has a net developable area of approximately 1.22ha and is estimated to provide 37 dwellings at a density of 30 dph.
H43	Land west of Burnley Road, Weir	1.23	0.46	10	22	The density for this site has been reduced from 14 dwellings proposed at Regulation 18 (density of 30 dph) to 10 dwellings at Regulation 19. It is considered that a low density would be more suited to the local character of the area.
H14	Hall Carr Farm, off Yarraville Street	1.31	1.07	26	24	The number of dwellings was identified from a previous outline application on the site (reference 2015/0489). This application was eventually refused due to a lack of agreement regarding Section 106 monies but as the principle of development had been accepted during the decision process, the number of dwellings proposed was still thought to be appropriate.
H39	Land off Cowtoot Lane, Bacup	7.92	5.93	151	25	The site was originally proposed at a low density to reduce impact on landscape, due to the prominent position and location adjoining the Countryside. A more detailed parameters plan was made available at the Hearing, which recognised these constraints (please see Appendix 1and note on Action 10.7). This included avoiding development to the north of the site which further reduced the net developable area to 2.76ha. The estimated housing potential is now 82 dwellings which would achieve 30 dph.

3   Density optimisation (Action 8.4)

3.1   The NPPF is clear that where there is an existing or anticipated shortage of land to meet identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

3.2   During the site selection process and the identification of the housing land supply, density was carefully considered by the Council. This took account of the need to optimise density wherever possible but was also mindful of other considerations, such as those set out in paragraph 122 of NPPF. This states that development that makes efficient use of land should be supported, taking into account issues such as local market conditions and viability, the capacity of existing infrastructure and services, including sustainable travel modes, the desirability of maintaining an area's prevailing character and setting (including residential gardens) and the importance of securing well-designed, attractive and healthy places.

3.3   Mindful of this the Council has maximised density where appropriate to do so (e.g. in the most sustainable locations or on existing developed land, such as former mill sites). A high density has not been considered appropriate for every site though, and particularly where this would have an adverse impact on the surrounding character or existing infrastructure. This is especially the case in an area such as Rossendale where, aside from the traditional terraced areas around the centres and within the urbanised valley bottoms, much of the area is rural and not typically characterised by high density development.

3.4   Therefore, rather than applying a blanket density multiplier for all sites, potential capacity for each allocation was determined by first estimating the net developable area of the site (taking account of the need to avoid flood risk, areas of habitat etc.) and then applying other considerations. These included the location of the site in relation to access to public transport and other services, density of the surrounding area, potential effect on landscape, the setting of heritage assets and so on. Keeping the density to a moderate level reflects the need identified in the Strategic Housing Market Assessment (SHMA) to provide a wider range of dwellings, including larger, lower density homes with parking spaces and gardens.   This is especially the case as there is a predominance of small, high density terraced properties.   In relation to brownfield land, however, the Council took the view that the density should be maximised where appropriate to reduce the need to allocate greenfield land. In particular though, for those allocations which are located on the edge of the urban area, it is not generally considered appropriate to have high density development. This is in order to ensure that good design is achieved taking account of the urban/rural interface.

3.5   The average density of development on the 23 proposed brownfield sites allocations is approximately 100 dwellings per hectare (dph). This includes sites up to 550dph on development involving conversion of existing buildings such as H2 Magistrates Court, Rawtenstall. Even if the highest density sites are removed (i.e. all those over 100dph), the average still emerges at around 50dph which is relatively high for a borough such as Rossendale. The average density on the remaining mixed greenfield / brownfield and fully greenfield sites is just over 30dph, which again is considered to be a reasonable density given the character of the borough.

Application of policy HS7 Housing Density

3.6   The proposed policy HS7 seeks to ensure that development provides high densities within sustainable locations, particularly on sites within town centres and within 300m of bus stops on key transport corridors. This note provides clarification of how this approach was applied to the proposed allocations.

3.7   As set out above, the identification of site capacities was very much based on the characteristics of individual sites rather than as a blanket approach. There is only one town centre allocation but higher densities were sought on brownfield sites, where appropriate. However, the approach was not necessarily applied to all sites within 300m of key transport corridors.

3.8   During the hearings, it was acknowledged that, because the Borough is very linear in nature, a very large part of the borough could fall within 300m of a key transport corridor. However, not all these locations would necessarily be suited to high density development. A Main Modification was therefore proposed which would amend the policy to only ask for high density in town centre locations. In light of this, it is considered that the density optimisation was appropriate.
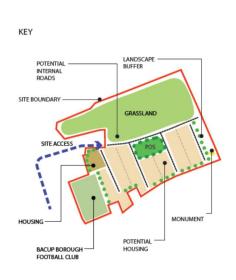
Comments from the hearing statements

3.9   During the hearings, it was argued that the Council had overstated the density that had been achieved on the allocations, particularly brownfield sites, which in fact had an overall density of just 44dph, not around 100dph. The implication of this would be that the Council could have increased the density to a greater degree and possibly reduced the overall amount of land required.

3.10   Conversely, other representations stated that the Council had overestimated the number of dwellings that could be provided on the sites and in reality these should be lower (having the effect of reducing the overall density). This would mean the Council should provide more land to meet the housing requirement.

3.11   It is recognised that there are different ways of calculating an "average" density. For example, the total number of dwellings could be divided by the total site area of all allocations, or density calculated for each site and then an average taken of all the individual densities. In the case of brownfield allocations, the first calculation would indeed generate a density of approximately 44dph (i.e. 603 dwellings with a total site area of 13.75ha) while the second calculation would generate a figure of 108 dph. The second method gives equal weight to large and small sites, meaning that small sites (usually with a higher density) have the same importance as large sites (usually with lower density), therefore providing a higher average.

3.12   If the first method of calculation was carried out for all the proposed allocations, the overall density would emerge at just over 30dph (2853 dwellings with a total site area of 93.6ha) [2] instead of 53 dph as stated in Table 1 in policy HS2. However, as indicated in Table 1 of this note, if the actual amount of land which is proposed to be built upon was to be identified i.e. removing any land set aside for open space, landscaping, protection of the setting of heritage assets and so on, from the net developable area, the overall density would be higher.

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[2] The submission version of the Local Plan stated a total 95.11ha but this included the incorrect net developable area for H72

4   Conclusion

4.1   The Council acknowledge that an average density figure can be skewed by sites which have a particularly high density, such as those involving conversions of existing buildings. However, even if using the lower density calculation and not taking account of the land which will not get built upon, the Local Plan allocations have achieved a reasonable density which is considered to be appropriate for the area. That is, higher densities have been identified wherever possible but not so high as to negatively affect the character and amenity of the area or which would affect the ability to develop larger/lower density homes in those areas which would benefit from this type of provision.

4.2   Therefore, the Council consider that it has achieved an appropriate balance between optimising density where possible and applying realistic and achievable densities in other areas. Apart from some minor changes to the dwelling numbers which were discussed during the hearings, the Council is satisfied that the indicative capacity of the proposed allocations is reasonable.

APPENDIX 1: Amended developable areas for H39 - Land off Cowtoot Lane, Bacup

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