

Edenfield Community Neighbourhood Forum

Rossendale Local Plan Examination Submission

29th August 2019.

Hope View Market Street Edenfield



Edenfield

Rossendale Local Plan Examination

Hearing Statement

Matter 14:

**Housing site allocations: Edenfield, Helmshore, Irwell
Vale and Ewood Bridge**

Alan G. Ashworth and Richard W. Lester.

Edenfield

Contents:

Matter 14 – Housing site allocations: Edenfield, Helmshore, Irwell Vale and Ewood Bridge

Issue – Are the proposed housing allocations in Edenfield, Helmshore, Irwell Vale and Ewood Bridge justified, effective, developable/deliverable and in line with national policy?

**H72 – Land west of Market Street, Edenfield
Policy HS3: Edenfield**

Questions, Responses and Comments.

Suggested Revisions.

Alan G. Ashworth and Richard W. Lester: Questions, Responses and Comments

H72 – Land west of Market Street, Edenfield Policy HS3: Edenfield

- 1) **Question a:** What effect would the proposed housing allocation H72 have on local landscape character and appearance, and the setting of the village? Could impacts be mitigated?

Response: The RBC Landscape Consultants concluded that the main area of Site H72 was “**Not suitable for development on Landscape grounds**” and commented that “The greater part of this site, Area A, is unsuitable for development, because the effects on the landscape would be significant, and would be uncharacteristic of the local landscape character area, 8b Irwell Valley south. **Nor could it be effectively mitigated against** because of the sites openness. Long views west from [Market Street] and eastwards from the far side of the valley would be affected and there would be significant adverse effects on attractive and well used walks in the area”. (See pages 127-132 in the 2015 report.)

- 2) **Comment:** It is clear from the Landscape Consultants that there would be a significant adverse effect on the Landscape and the long views from both directions. Additionally, they highlight that it could not be effectively mitigated against. RBC disregards the consultants’ conclusions where those do not justify the use of Green Belt in the main area of Site H 72. RBC’s reason, that they had “used . . . planning judgement in coming to an opinion on the impact on Openness” substitutes the partisan opinion of generalists for the disinterested opinion of landscape specialists. **(See Green Belt Topic Paper, August 2018, page 12.)**

- 3) **Question b:** Is the scale of the proposal consistent with the development hierarchy and the sustainability of its village location? What proportional growth does it represent for Edenfield? What effect would the scheme have on the function, form and identity of the village?

Response: The scale is totally disproportionate, it is difficult to understand why RBC would choose to allocate 87% of the houses being built on Green Belt to Edenfield and inflict growth of 47% in contrast to the 10% for the Borough as a whole.

It is equally difficult to comprehend why 96% of the homes being proposed on Green Belt are being allocated to the south west particularly when RBC have identified “There is a high level of housing need in the east of the Borough and around Rawtenstall”. **(See Appendix ECNF - GBP 2 & Green Belt Topic Paper page 21.)**

- 4) **Comment:** There are significant infrastructure issues in Edenfield: local roads and the Strategic Road Network are congested at peak times, the primary schools are close to capacity and there are serious Landscape and Heritage Impact issues. The “open” aspect of the village would be lost along with its identity, the Residents would have to cope with fifteen years of construction congestion, associated noise and pollution and it would be difficult if not impossible to cope with the increased traffic flow. **(See ECNF-SoC & ECNF - GBP 1-7.)**

- 5) **Question c:** What effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Does the assessment in the Council’s Green Belt Review give appropriate recognition to the site’s strategic role in preventing the unrestricted sprawl of Manchester? What are the exceptional circumstances that justify altering the Green Belt in this case?

Response: The wonderful long views across the valley would be lost, RBC appear to overrule NPPF paragraphs 134, 136, 137a and 138 which should be protecting this land. RBC have been unable to provide any cogent evidence of exceptional circumstances justifying use of Green Belt for housing or employment purposes now or in the foreseeable future. (ECNF – GBP 6)

- 6) **Question d:** What range of mechanisms to enhance the Green Belt are expected from developers, as set out in section e in Policy HS3? How does this fit with the requirement for developer contributions, as set out in Policy SD2? Is the specified enhancement of land between the site and Rawtenstall/Haslingden justified and deliverable?

Response: RBC has not identified how they would begin to compensate in the remaining Green Belt for the removal of a tract with the landscape value of H72. Obviously it is impossible to compensate as RBC implicitly acknowledge. (See ECNF – GBP 1-Conclusion 12.)

Policy SD2 completely fails to 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. It is therefore not consistent with the NPPF, paragraph 138. The absence of detail as to calculation of contributions or what works will be carried out, where, and by whom, on whose land and at whose cost and how they would be co-ordinated, facilitated and delivered renders Policy SD2 so vague as to be undeliverable. The Explanation refers to SANGs, but RBC has presented no policy on these.

RBC should respond with respect to the site between Rawtenstall and Haslingden.

- 7) **Question e:** What are the key transport and access infrastructure requirements/costs associated with the proposed scheme? Are there any delivery issues or phasing implications? Has any necessary third party land been secured for access? What is Lancashire County Council's and the Highways Agency's latest position?

Response: The Highways evidence base provided by RBC and the Site Promoters fails to assess the impact of the H72 development proposals, or consider the deliverability of access strategies and identify a robust mitigation package. There are significant issues with the Market Place mini-roundabout and all three proposed accesses points to site H72. (See ECNF –GBP 4.3 and ECNF-SKT.)

- 8) **Question f:** What scale and form of additional primary school provision would be needed to support the development? Is an expansion of Edenfield Primary School justified, deliverable and consistent with the Green Belt status of the land? If a new school is required, is there scope to accommodate this within the proposed allocation site, or elsewhere? What impact would on-site provision have on housing capacity? What provision is required for early years/childcare and secondary education facilities? What is Lancashire County Council's latest position?

Response: RBC & LCC should respond to this. However, there are serious parking, traffic and safety issues associated with the School in its present location and these need to be addressed before any expansion is considered.

- 9) **Question g:** What other infrastructure provision is needed to support the development? Should the level of provision/further detail be specified in Policy HS3?

Response: The Highways evidence base provided by RBC and the Site Promoters fails to assess the impact of the H72 development proposals, or consider the deliverability of access strategies and identify a robust mitigation package. There are significant issues with the Market Place mini-roundabout and all three proposed accesses points to site H72. (ECNF –GBP 4.3 and ECNF-SKT.)

Additionally, RBC, LCC and Highways England should respond on this.

- 10) **Question h:** What geotechnical work has been undertaken on the proposed site? What mitigation measures are necessary to ensure effective development and to resolve the concerns of Highways England?

Response: RBC and the Developers should respond to this, with further input from Highways England.

- 11) **Question i:** Have other constraints including heritage, biodiversity and trees, flood risk, drainage, noise, air quality and contamination been satisfactorily investigated and addressed? Are related mitigation measures/requirements necessary and clearly expressed in Policy HS3?

Response: RBC's Heritage Impact assessment stated: **H72. SHLAA 16262.** "Site contains or adjoins a listed building". Conclusion -"Acceptable if the site is significantly reduced, inclusive of proposed numbers and boundary shall be pulled south of Mushroom House". (See ECNF – GBP 4.2.)

Policy HS3 acknowledges the need for mitigation of noise from the A56 and a health impact assessment but does not express them clearly, if at all – it says merely that they will be part of some future Design Code. If noise were to be mitigated by an acoustic fence, that could be seriously obtrusive, viewed either from the village or from the west. Likewise, drainage is to be in the Design Code. HS3 is silent on flood risk.

- 12) **Comment:** The Heritage proposal relates to the same area the Landscape Consultants described as not suitable for development providing additional background evidence to retain the site in the Green Belt.

- 13) **Question j:** What is the net developable area (15.25 hectares) based on, and is it justified? Does it take account of potential future road widening on the A56, as identified in the Local Plan Highways Capacity Study?

- 14) **Response:** The figure of 15.25ha does not tally with the net developable area figures in SHLAAs 16256, 16262 and 16263 for the component sites (2.09 + 9.12 + 2.32 = 13.53ha). We presume that neither the Plan nor the SHLAA figures allow for widening the A56. As well as the points highlighted in the question, consideration is also required for the Landscape and Heritage Issues which would have a major effect on the area available. Additionally, both RBC and Highways England do not appear to be considering the possibility of widening the A56 despite their proposal to build 3,180 more homes. Note: if the A56 is to be considered for improvement the utilisation of a significant portion of site H72 would be essential.

- 15) **Question k:** Is the site capacity of 400 dwellings appropriate, taking account of constraints and infrastructure provision?

- 16) **Response:** The issues highlighted in question j and the response also need to be considered with this question as well as the SK Transport Highway Study conclusions.

- 17) **Question l:** Why is the northern boundary of the site allocation, as shown on the Policies Map, different to the proposed development area on the Combined Illustrative Masterplan? Is the northern section no longer required for development purposes? What is the gross and net site area shown in the Masterplan?

Response: RBC should respond to this.

- 18) **Question m:** Is the site available and deliverable in the timescales envisaged?

Response: There needs to be a review of all the Highway Issues before this question can be answered. (See ECNF – GBP 4.3.)

<p>H70 – Irwell Vale Mill, Irwell Vale H71 – Land east of Market Street, Edenfield H73 – Edenwood Mill, Edenfield H74 – Grane Village, Helmshore</p>
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The general questions below apply to each of the above sites. Additional specific questions are set out in the following sections.

General

- 19) **Question General a:** Is the site suitable for housing? Are there any specific constraints or requirements associated with the site, or a need to seek mitigation measures to achieve an acceptable form of development? Should these be specified in the Plan?

Response: Our comments relate only to H70, H71 & H73. Each of these sites contains a proportion of brownfield land, two with dilapidated old factory buildings and one used for storage purposes, part of which is in Green Belt. (See ECNF - GBP 5.)

- 20) **H70 – Irwell Vale Mill.** We support this development because it reduces flood risk and enables appropriate redevelopment.
- 21) **H71. East of Market Street.** We support this allocation because of the Brownfield content and the opportunity to enhance the area and the relatively small nature of the site.
- 22) **H73 – Edenwood Mill, Edenfield.** We support this proposal; it enables redevelopment to enhance the area and removes the danger of injury to children who play close to the site.
- 23) **H74. Grane Village.** RBC should respond.
- 24) **Question General b:** Is the proposed site capacity appropriate, taking account of constraints and the provision of necessary infrastructure?
- 25) **Response:** RBC should respond to this on a site by site basis.
- 26) **Question General c:** Is the site available and deliverable in the timescales envisaged?
- Response:** RBC should respond to this on a site by site basis.
- 27) **Question General d:** For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?

Response: RBC should respond on this on a site by site basis.

H73 – Edenwood Mill, Edenfield

28) **Question H73 i:** Are the site allocation boundary and revised Green Belt boundary appropriate and justified? Should the site be extended to include land to the east and north-east?

Response: No additional Green Belt land should be allocated to this site.

29) **Question H73 ii:** Can the site be safely accessed? Is part of the site needed for future junction improvements on the M66 motorway? What is Lancashire County Council's latest position?

Response: RBC, LCC and Highways England should respond.

H74 – Grane Village, Helmshore

30) **Question H74 i:** What is the nature of the surface water flooding risks on the site? Can this be mitigated?

Response: RBC should respond on this.

31) **Question H74 ii:** Can the site be safely accessed? What impact would the proposal have on the local road network, and are mitigation measures necessary? What is Lancashire County Council's latest position?

Response: RBC should respond on this.

32) **Additional Comment:** The title for Matter 14 includes a reference to Ewood Bridge. This provides an opportunity for us to highlight the Lindon Park development which has Extant Planning Approval for 187 homes. RBC has not mentioned this in any of their proposals; however the following Representation was made with respect to it:

33) **13/2/2600LA & 13/2/2758 1972 Planning Permission.** Lindon Park Road, Ewood Bridge, Haslingden. Original planning permission was for 231 homes, of which 44 were constructed around 1974. [187 dwellings.](#)

34) **ECNF Comments.** A Regulation 19 representation has been submitted from dpp Planning Ltd on behalf of Lindon Park Developments Ltd to continue the development first started around 1974 on the site and construct the remaining 187 dwellings. The site was taken into the Green Belt some time after the completion of the first 44 dwellings, but it continues to have the benefit of extant planning permission. As such it differs from other Green Belt sites, as the extant permission renders it difficult for the local planning authority to justify refusal of an application for a different housing development on the undeveloped part of the site. The continuation of the development would significantly enhance the whole area and dramatically change the appeal of the existing housing. There are no problems with access. A major advantage of this site is its close proximity (some 800m) to the main A56 roundabout with access and exits going both north and south. Additionally, the schools and a large supermarket are in close proximity. (Refer to Appendix 1 pages 178 to 206, to RBC's November 2018 collection of Regulation 19 responses.)

This site should be given preference to other Green Belt sites due to its Extant Planning Approval. **(See ECNF – HLA 4.)**

Suggested Revisions to the Plan.

In order to make the Local Plan sound it will be necessary to remove site H72 from the Housing Allocation List, delete Policy HS3, amend the Employment Land requirements and revise the associated policies.

We have provided reasoned, justified alternatives in four **Appendices ECNF – SoC; ECNF – HLA 4; and ECNF – GBP 1-7** along with our response to four MIQ's to support the actions proposed.

A.G.Ashworth and Richard Lester

28.08.19.