

Edenfield Community Neighbourhood Forum

Green Belt Paper

29th August 2019.

Hope View Market Street Edenfield



Edenfield Community Neighbourhood Forum

Green Belt Paper

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Green Belt Comments

Green Belt Topic Paper Dated August 2018

1) Area Analysis of Land Types and Location of Green Belt

The total area of the Borough is 13,800ha, approximately 67% of this is Countryside, approximately 23% is Green Belt and approximately 10% is Urban Boundary. **(See Green Belt Topic Paper, Section 1 Page 3.)**

With Countryside being nearly three times the size of the Green Belt it is difficult to understand why RBC would ever contemplate using any of the valuable and irreplaceable Green Belt for housing or employment purposes.

Additionally, 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. **(See Appendix ECNF - GBP 2.)**

2) National Planning Policy Framework (NPPF). All of the land involved in H72 meets the majority of the five purposes which the NPPF says Green Belt serves. RBC has failed to provide any cogent evidence or justification for exceptional circumstances which are required under Paragraph 136 to support its release. **(See Appendices ECNF-GBP 3 & ECNF-GBP 6).** Additionally, they have not complied with section a in Paragraph 137 or provided the priority to sustainable sites in Paragraph 138. **(See Appendix ECNF-GBP 3.)**

3) Background Evidence.

a) Green Belt and Landscape Studies. RBC has used studies carried out by Penny Bennett Landscapes in 2015 & 2017 and by LUC in 2016. They have been selective as to which parts of the studies they adopt and overrule conclusions which do not justify the use of Green Belt in the main area of H72. RBC's reason for disregarding their Consultants' proposals was that they had "used . . . planning judgement in coming to an opinion on the impact on Openness" **(Green Belt Topic Paper, page 12).**

The Green Belt Topic Paper, page 10, claims that the release of Green Belt has been considered first and foremost in the context of "Exceptional Circumstances" yet RBC fail to provide any cogent evidence to justify their decisions. **(See Appendix ECNF - GBP 6).**

b) Housing Land Availability. Analysis reveals sites for 1,508 dwellings with at least another 439 becoming available from surplus employment land. **(See Appendices ECNF-HLA1 to 8 & ECNF-ELR1 to 7).**

c) Employment Land Study. The evidence provided by Lichfields' Reports and the Employment Land Topic Paper (March 2019) is seriously unsound, creating a grossly inflated employment land requirement. Our analysis shows that the employment land requirement is at most 10.72ha, resulting in a surplus of over 20ha available for other purposes. **(See Appendix ECNF-ELR1, Section 3.)**

d) Highways Study. 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 to site H72. **(See ECNF – GBP 4.3 and ECNF-SKT.)**

e) Heritage Impact Assessment. RBC's own Assessment concludes that approximately 50% of SHLAA 16262 should be excluded from development, providing further support for removing site H72 from the Housing Site Allocation list and retaining it as Green Belt. **(See Appendix ECNF-GBP 4.2 - SHLAA 16262.)**

f) Duty to Co-operate. It is noted that adjoining authorities are unable to assist, but this of itself is no justification for building in Green Belt. **(See Green Belt Topic Paper, page 26.)**

4) Exceptional Circumstances. It is clear that RBC is unable to provide any cogent evidence or justification for taking Green Belt for housing purposes. (See Appendix ECNF- GBP 6.) RBC claim (Green Belt Topic Paper, page 21) a grossly inflated housing density figure of 100 for Brownfield sites when the figure is actually 44 and make similar erroneous claims for their mixed site figures. **(See Appendix ECNF- GBP 7.)**

5) Proposed Green Belt changes. The changes to the Green Belt for housing involve five sites, four of which have brownfield content. Additionally, these four also have an element of enhancing their respective areas either through the demolition of dilapidated buildings or tidying up its appearance. The only exception is site H72 where RBC seem unable to accept that it is entirely greenfield. **(See Appendix ECNF - GBP 5.)** Although the Submission Version Local Plan Written Statement describes H72 as greenfield, the contemporaneous Housing Topic Paper perpetuates the erroneous description 'Mixed but largely greenfield'. That Topic Paper also erroneously states that H72 includes SHLAA 16358. SHLAA 16358 is the site of the former Horse & Jockey Inn, a brownfield site being redeveloped for housing. Documents *EL1.002c(v) Edenfield Submission Policies Map* and *EL1.002e(vii) Appendix 4c Location of Assessed Housing Sites - West (A1)* (both published in June 2019) as well as *SD003 Submission Version Policies Map* also wrongly show H72 as including the Horse & Jockey site. This is despite RBC issuing an Erratum on 3rd September 2018 to confirm that H72 is entirely greenfield. For some reason they have now reverted to including in H72 SHLAA 16358 which is almost completed, to enable them to classify the site as "Mixed". Further proof that SHLAA 16358 was never in H72 comes from the number of homes involved. H72 was originally noted as having 406 homes made up from SHLAA 16256 with 63; SHLAA 16262 with 273 and 16263 with 70 and no reference to number of homes from SHLAA 16358. This

was subsequently rounded by the Forward Planning Team to 400 and confirmed at one of our meetings with them.

The proposals with respect to the Green Belt changes relating to Employment Land also need to be re-examined in view of our Employment Land analysis.

6) Housing Density Figures. RBC claim in their Green Belt Topic Paper under Exceptional Circumstances (page 21) that they have an average housing density of 100 dwellings per hectare on the 23 Brownfield Sites but in reality the figure is 44. They also claim the average density for Brownfield and mixed sites is 75 per hectare but in reality it is 39. The density figures quoted in the summary table on page 22 of that Paper are also widely inaccurate. **(See Appendix ECNF - GBP 7.)**

Overall conclusions:

1. Paragraph 3b above identifies sites with capacity for 1,947 dwellings over and above the number in the Local Plan, none of which is in the Green Belt. There can be no justification for removing Greenfield land from the Green Belt for residential development, when the supply of land elsewhere which is suitable for housing has not been exhausted.
2. The issue of past under-delivery is addressed by the Housing Trajectory data showing a sufficiency of sites in the first five years of the plan period. Appendix 4, Local Plan shows 1,640 dwellings (1,060 + 54.7% buffer) to be completed in Years 1-5, against a requirement of 1,272 (including 20% buffer).
3. RBC's Employment Land calculations are inaccurate: the requirement is inflated by more than 20ha, and, if half of this were reallocated for housing, it would create 439 additional homes based on the housing density figures for Brownfield sites.
4. In the Green Belt Topic Paper conclusion RBC claim to recognise the importance of the permanence of the Green Belt and not to take its release lightly, yet they continue to propose it despite serious inaccuracies in both their Housing and Employment Site Allocations reviews. They have been made aware, and should have been aware in any case, of virtually all the points highlighting the inaccuracies of their housing evidence base through ECNF's previous representations. However, they disregard the information.
5. RBC commented on the exceptionally high level of representations made against the proposals for Edenfield, over 800 at the Regulation 18 Consultation and 1,235 during the Regulation 19 Consultation, but in reality they have disregarded the response from the community.
6. RBC are aware there is nearly thrice as much Countryside as Green Belt but they continue to champion the use of Green Belt. They know of the significant number of alternative sites which avoid the need to use Green Belt but they just disregard it.
7. RBC see the importance of a balanced approach, yet with overall growth for the Borough at 10% their use of Green Belt results in growth of 47% in Edenfield despite this scale of

development being totally disproportionate and unsustainable in terms of infrastructure. 87% of the developments proposed on Green Belt are allocated to Edenfield despite RBC's having identified a high level of housing need for the east of the Borough and Rawtenstall (Green Belt Topic Paper, page 21), where no Green Belt is being allocated. RBC's balanced approach leads them to put by far their largest development in the Borough into one of their smaller villages with significant infrastructure issues.

8. RBC have utilised the information from studies by Penny Bennett Landscapes in 2015 and 2017 and by LUC in 2016, but have been selective as to which parts they adopt and which parts they overrule. RBC disregards the consultants' conclusions where those do not justify the use of Green Belt in the main area of Site H72. 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 RBC's Green Belt Topic Paper August 2018, page 12.)

9. Additionally, RBC's Heritage Impact Assessment highlights that half of SHLAA 16262 within H72 would need to be excluded. RBC's own document, which is contemporaneous with the Regulation 19 Local Plan, shows that the current H72 allocation will have an injurious impact on heritage.

10. 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 to site H72. **(ECNF –GBP 4.3 and ECNF-SKT.)**

11. The eight points which the Green Belt Topic Paper highlights as Exceptional Circumstances have no real substance, only proving once again they have no cogent evidence or justification to release any Green Belt land for Housing or Employment.

12. RBC has not identified how they would begin to compensate in the remaining Green Belt the removal of a tract with the landscape value of H72. Obviously it is impossible to compensate, as RBC implicitly acknowledge. In a wholly inadequate nod to the NPPF, the Green Belt Topic Paper, page 26, does no more than offer platitudes: "Exactly how this will be implemented is still an area for consideration" and "Working with a range of partners is likely to be necessary to effectively implement [a SANG]".

13. It is not exceptional for a road to run through Green Belt. That is no justification for re-aligning the Green Belt boundary with the road.

14. Any large site can be masterplanned. The potential for masterplanning is not an exceptional circumstance justifying removing Green Belt protection.

15. Site H72 is described by RBC's own landscape consultants in both 2015 and 2017 as "not suitable for development on landscape grounds". The Lives and Landscapes paper, 2015, referred to the importance of long views and the need to protect them, along with development edges, contours, skylines and open countryside.

16. It is noted that as recently as 2013 (see Green Belt Topic Paper, Appendix A) RBC would make changes to the Green Belt only in **exceptional circumstances** and where they were **small scale** and would not increase the overall area of a settlement by **more than 5%** and subject to criteria including:

it would not **adversely impact upon local and longer distance views** or **detrimentally affect the openness** of the Green Belt; and

it does not make a **significant contribution to the beneficial use** of the Green Belt.

There is no evidence or justification for abandoning that policy.

17. There is no doubt that in its current form the Local Plan is not consistent with the NPPF and is seriously unsound. **(See Appendix SoC, conclusions 16 & 17).**

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Green Belt Comments

Appendix ECNF - GBP 2

Area Analysis of Land Types and the Location of Green Belt in the Borough.

Area Analysis of Land Types in the Borough:

The total area of the Borough is 13,800ha, of which approximately 67% is Countryside, approximately 23% is Green Belt and just under 10% is Urban Boundary. **(See Green Belt Topic Paper, page 3.)**

Location of Green Belt in the Borough.

The main locations of Green Belt in the Borough are in the following places **(See Green Belt Topic Paper, page 3):**

*Around Rising Bridge. This overlaps with Green Belt with Hyndburn Borough Council and is intended to prevent the merging of Rising Bridge with the settlement of Baxenden.

* Between Rawtenstall and Haslingden. The Green Belt in this area is intended to prevent the merging of the two settlements with the gap between them being narrow at this point.

*In the south west of the Borough. In this area the Rossendale Green Belt adjoins the Greater Manchester Green Belt within Bury. As well as protecting the identity of small settlements such as Irwell Vale and Chatterton the Green Belt in this location helps to prevent settlements such as Edenfield and Stubbins from merging with Ramsbottom.

*Between Waterfoot and Stacksteads. This is a small, isolated area of Green Belt which keeps an area of open land between the two settlements, particularly in the area known as the Glen.

*Land around Britannia, Sharneyford and Whitworth. The Green Belt in this location helps to prevent any further merging of these ribbon settlements and also forms an extension of the Greater Manchester Green Belt in Rochdale.

ECNF Comments:

- With nearly three times as much Countryside as Green Belt why is RBC proposing to use any Green Belt for Housing or Employment purposes?
- With Green Belt being available in most areas of the Borough why is 87% of housing proposed for construction on Green Belt being allocated in Edenfield?

- With Green Belt being available in most areas of the Borough why is 96% of housing proposed on Green Belt being allocated to the south-west of the Borough?
- Why is RBC proposing growth in housing of 47% for Edenfield when there are significant infrastructure issues and the growth for the Borough as a whole is only 10%? **(See ECNF – SKT.)**

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ECNF Green Belt Comments

Appendix ECNF - GBP 3

National Green Belt Policy

National Planning Policy Framework (NPPF). This has recently (February 2019) been updated and the policy on Green Belt strengthened.

Paragraph 134 indicates that Green Belt serves five purposes:

- a) To check the unrestricted sprawl of large built-up areas;
- b) To prevent neighbouring towns merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and special character of historic towns; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 136 of the NPPF indicates that Green Belt boundaries should only be altered in “exceptional circumstances”, **be fully evidenced and justified** and done as part of a Local Plan.

Paragraph 137 indicates that Councils should look at all other reasonable options for meeting their housing needs and take into account whether the plan:

- a) Makes as much use as possible of suitable Brownfield sites and under-utilised land;
- b) Optimises the density of development.....including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) Has been informed by neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

Paragraph 138 indicates that if Green Belt is to be released Councils should give priority to sustainable sites, i.e. those which have been previously developed and/or have good public access to transport. It also identifies that Councils should identify how removal of land can be compensated through improvements to the remaining Green Belt.

ECNF Comments: 1) The proposed release of Green Belt in Edenfield for site H72 conflicts with the majority of the five purposes highlighted above.

2) With respect to Paragraph 136 RBC have not produced any cogent evidence or justification for Exceptional Circumstances. **(See Appendix ECNF-GBP 6.)**

3) With respect to Paragraph 137a RBC have failed to identify all the opportunities in terms of land availability in Brownfield, Urban Boundary and Countryside sites before turning to Green Belt. **(See Appendix ECNF-HLA 2 to 5.)**

4) With respect to paragraph 138 RBC have failed to give priority to sustainable sites and a good example of this is the Lindon Park development in Ewood Bridge. **(See Appendix ECNF-HLA4).**

5) RBC has not identified how they would begin to compensate in the remaining Green Belt the removal of a tract with the landscape value of H72. Obviously it is impossible to compensate, as RBC implicitly acknowledge. In a wholly inadequate nod to the NPPF, the Green Belt Topic Paper, page 26, does no more than offer platitudes: “Exactly how this will be implemented is still an area for consideration” and “Working with a range of partners is likely to be necessary to effectively implement [a SANG]”.

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ECNF Green Belt Comments

Appendix ECNF - GBP 4

Additional Background Evidence relating to Site H72

4.1 Landscape Study

Landscape Study by Penny Bennett Associates.

In the Lives and Landscapes Study carried out in 2015 and the update in 2017 Penny Bennett Associates examined site H72 and subdivided it into four parts A to D. Area A which is the main part of the site was described as **“Not suitable for development on landscape grounds”**.

They stated “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.)**

In July 2017 Penny Bennett Landscapes reviewed their 2015 Report at the request of RBC and reaffirmed their opinion that Area A of H72 was

“Not suitable for development on Landscape grounds.”

RBC’s statement relating to the Penny Bennett Landscapes comments with respect to Area A of site H72 is as follows: - “The Landscape Study is a material consideration in looking at sites and can add to and complement the work the Green Belt Study *sic* with respect to openness. Overall the Council has used its planning judgement in coming to an opinion on the impact on Openness.” This is despite the statement in the Lives and Landscape Paper, 2015 referring to the importance of long views and the need to protect them, along with development edges, contours, skylines and open countryside.

RBC have utilised the information from studies by Penny Bennett Landscapes in 2015 and 2017 and by LUC in 2016, but have been selective as to which parts of the study they adopt and which parts they overrule. 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.)

4.2 Heritage Impact Assessment

Heritage Impact Assessment of Housing and Employment Sites.

In the Heritage Impact Assessment site H72 was examined and the relevant comments were as follows:

H72. SHLAA 16256. Land between Blackburn Road & A56 Edenfield. Criteria “site contains or adjoins a listed building”. Conclusion. “Need to determine.”

H72. SHLAA 16262. Land west of Market Street Edenfield. Criteria “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. Highest quality materials and design will be required and standard modern construction will not be acceptable. Materials shall be natural stone, natural roofing slates and timber for doors and windows with no exceptions. The houses will be restricted to two stories on the entire site. A highly detailed landscaping plan will be essential; this will need to include strong buffering to the north of the amended boundary. Landscaping will also be required to buffer against any new roads of access which is created.”

H72. SHLAA 16263. Land off Exchange Street. Criteria “site within or adjoin a Conservation Area. Conclusion “Acceptable so long as the site is and yield is reduced and all mitigation measures are adhered to.”

ECNF Comment: The Assessment concludes that approximately 50% of SHLAA 16262 should be excluded from development. This provides further support for the removal of site H72 from the Housing Site Allocation list and for the land to be retained as Green Belt. **This is an additional reason to retain site H72 within the protection of the Green Belt.**

4.3 Highways Study

Development Impact Assessment.

Prepared by SK Transport. (Full Report is in Appendix ECNF – SKT.)

- The technical assessment work has considered the impact (in traffic and transport terms) of the proposed allocation only on a single junction within the village.
- No technical appraisal has been undertaken of the traffic impact on highway links or other junctions in the village.

- The assessments have not considered in any detail the deliverability of the access proposals to the land parcels, as shown in the Croft technical assessment.
- The assessments rely on traffic flow data for a single junction to the south of the village – The technical assessments have not considered peak period or daily traffic flow on Market Street through the village.
- All the technical assessment work from MM, Croft and SKTP of the only modelled junction (the Rochdale Road/Market Street mini-roundabout junction) confirms that in 2034 this junction will have a material worsening in its performance when compared to the reference case.
- The MM report confirms that at the Rochdale Road/Market Street junction there are limited opportunities to enhance the junction to increase capacity – The report states that the surrounding built up area “may prohibit the development of a scheme within the existing highway boundary”.

There are material differences between the findings from the MM study, which identifies the need to widen the A56 to three lanes and the HE response which confirms that as an organisation they have no proposals to take this widening scheme forward at this time

- The use of lower development vehicle trip rates by Croft inevitably results in their technical modelling showing a lower level of degradation at the aforementioned junction, but the overall effects of this significant level of additional residential development are shown in their technical modelling.
- All the technical modelling confirms a fundamental issue with the impact of development traffic at this junction, indicating the scale of development proposed will have an adverse impact.

Access Strategies

- No access appraisal work has been submitted by either the Council or site promoters to demonstrate the development parcels can be safely accessed.
- The SKTP access review has confirmed that the access strategy for the southern development land parcel is severely constrained by both the existing sub-standard visibility at the Exchange Street/Market Street simple priority junction, and also the narrowing of the eastern section of Exchange Street to single way traffic working due to on-street residential parking.
- The Land West of Market Street development parcel proposes a simple priority junction arrangement onto Market Street.– This is in a location where residential parking currently takes place on both sides of the carriageway, and vehicle speeds have been recorded to be in excess of the 30mph speed limit. Additionally, the footway on the eastern side is very narrow at this point.
- The two-way traffic flows on Market Street have been recorded as exceeding 8,000 vehicles per day, and an indicative assessment of the expected daily two-way vehicle movements from the development are predicted to be in excess of 1,000 movements. – This flow data indicates that a ghosted right turn priority junction arrangement should be provided to safely access the development site, in line with TD 42/95.
- This ghosted right turn junction arrangement cannot be accommodated within the land controlled by the site promoter or the adopted highway, indicating that there is a fundamental issue with the allocation of this site for the scale of development proposed.

- At the northern development site access, to achieve the required 2.4m x 43m junction visibility splays land across the adjacent field to the north would have to be brought into the proposed site allocation area.

These findings demonstrate that the technical work prepared by the Council and site promoters to date has not appropriately assessed the impact of the scale of residential development on the village.

In addition detailed assessments of the proposed access strategies to the various land parcels have not been presented, and from site visits fundamental issues have been identified that bring into question the delivery of these sites for residential development.

The importance of undertaking detailed and robust appraisals of all traffic and transport matters as part of the consideration of potential development allocations in the emerging Local Plan should not be underestimated. A failure to appropriately assess the development impact, access strategies and potential mitigation measures at this stage could result in a Planning Inspector finding the Local Plan unsound, and an inability by the site promoter to implement their schemes if the Local Plan is adopted.

From all interested parties' perspective it is vitally important that all technical matters relating to development impact, access and mitigation measures are assessed before any Local Plan Examination takes place. Based on the information presented to date the draft residential site allocations have been shown to have an adverse and potentially severe impact on the surrounding highway network.

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Appendix ECNF - GBP 5

Proposed Green Belt Changes (See Green Belt Topic Paper, pages 15 to 20).

We comment on the individual changes below, but it is important to highlight that the housing figure total in the Regulation 18 Draft Local Plan was 3,975 dwellings and that this was reduced in the Regulation 19 Draft to 3,180. This reduction of 795 dwellings provided an opportunity for all of the 786 dwellings proposed for construction in Green Belt to be removed from the Housing Site Allocation list.

Housing Sites (with summary descriptions based on the Topic Paper)

- 1) H69. Cowm Water Treatment Works, Whitworth.** Partly Brownfield; includes the Treatment Works for a decommissioned reservoir (20 homes).

ECNF Comment: We support this small scale development because of its Brownfield content and because redevelopment would enhance the area.

- 2) H70. Irwell Vale Mill.** Includes the demolition of an old mill and creates an opportunity to reconfigure the River Ogden and reduce flood risk. (45 homes.)

ECNF Comment: We support this development because it reduces flood risk and enables appropriate redevelopment.

- 3) H71. Edenfield –Land east of Market Street.** Existing Brownfield Site used for storage purposes, part of which is in Green Belt. Its Brownfield nature, its small scale and the opportunity to enhance a currently untidy area of land is considered to justify release. (9homes.)

ECNF Comment: We support this allocation because of the Brownfield content and the opportunity to enhance the area.

- 4) H72 Edenfield – west of Market Street.** This is by some distance the largest housing site being proposed in the Borough in one of the smallest villages, Edenfield, and it has received a significant amount of local opposition owing to its scale, location, infrastructure and visual impacts. The site forms Parcels 39, 43 and 44 in the Green Belt Study. The LUC study suggests that in Green Belt terms the site performs relatively weakly, partly because the site is contained by the A56 (T) which forms a strong physical and visual barrier. The Study recommends that the site be developed from south to north. The Penny Bennett Landscape Study does not consider that the central area of the site is suitable for development. The site is in a viable location with willing Landowners. It is recognised that a strategic Masterplan led approach is required, including landscaping and infrastructure provision, and this is set out in Policy HS3. (400 homes.)

ECNF Comment: The Consultants have opposing views, LUC claiming that Parcels 39, 43 and 44 do not perform strongly yet Penny Bennett Landscapes stating part of the site should not be developed both in 2015 and again in 2017.

We robustly oppose this development utilising Green Belt land when RBC has many alternatives available and we comment as follows:

- a) **Over 800 representations** were lodged against this proposal at the Regulation 18 Consultation and 1,235 at the Regulation 19 stage.
 - b) The proposals for Edenfield total 456 homes. This is disproportionate as Edenfield's housing stock would increase by 47% against 10% for the Borough as a whole.
 - c) **NPPF.** RBC has not met any of the conditions outlined in Paragraphs 136, 137a and 138 of the National Planning Policy Framework to justify the inclusion of this Green Belt site.
 - d) There is clearly no need for any Green Belt land to be used in the Borough when we have identified alternative sites for 1,508 dwellings from non-Green Belt land plus a further 439 dwellings from sites which are no longer suitable for employment purposes and a possible contribution from both Windfall sites and the 1,207 Empty Homes. **(See Appendices ECNF - HLA 1-8 and ECNF - ELR 1 Conclusion)**
 - e) **Comments from the RBC Landscape Consultants** state the main area of site H72 is "Not suitable for development on Landscape Grounds". **(See Penny Bennett Landscapes Studies in 2015 & 2017.)**
 - f) **Heritage Impact Assessment. (See Appendix ECNF-GBP 4.2.)** This document highlights the necessity to move the boundary line for this development on HIA issues.
 - g) **Duty to Co-operate.** It is noted that adjoining authorities are unable to assist, but this of itself is no justification for building in Green Belt. **(See ECNF - GBP 1, paragraph 3f)**
 - h) **Proposed Green Belt changes.** RBC highlight that the changes proposed for housing in the Green Belt have been scaled back. RBC list the Green Belt sites removed which are all greenfield sites with no brownfield content. (Green Belt Topic Paper, page 20.) The only 100% greenfield site in Green Belt still allocated for housing is H72. **(See individual site comments below.)**
 - i) **Exceptional Circumstances.** RBC has failed to provide any cogent evidence or justification in terms of Exceptional Circumstances. **(See Appendix ECNF GBP 6.)**
- 5) H 73 Edenfield-around Edenwood Mill/ Wood Lane.** Edenwood Mill is an existing though dilapidated building in the Green Belt so its development could be acceptable in Green Belt terms. The wider area (Green Belt Study Parcel 49) does not recommend release of the area for housing though the landscape study considers the release of this particular area would

be acceptable. The existing access is extremely poor so creation of a new road through to Wood Lane would require [passage] through the Green Belt.

ECNF Comment: 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.

Employment Sites (with summary descriptions based on the Topic Paper)

- 1) NE1 Extension to Mayfield Chicks, Ewood Bridge.** An existing employment area already exists to the South of the proposed Green Belt release. The Green Belt Study (Parcel 26) identifies that the parcel is suitable for release and would have defensible barriers. There is an element of flood risk at the northern end of the site.

ECNF Comment: We do not support this proposal to use Green Belt for employment purposes when it is clear there is a surplus of employment land.

- 2) NE 2 Land north of Hud Hey near Acre.** Land north of Hud Hey is not recommended for release in the Green Belt Study (Parcel 10) because of its role in separating Haslingden and Rising Bridge. However discussions with local developers indicate a strong interest in the site with its proximity to the A56 (T). There is an overall shortage of suitable employment sites close to the A56.

ECNF Comment: We do not support this proposal to use Green Belt for employment purposes when it is clear there is a surplus of employment land. The Green Belt study does not support its release. **(See Appendix ECNF-ELR1.)**

- 3) NE 4 New Hall Hey Extension.** The land at New Hall Hey (west of the river-the east side of the river is not Green Belt.) is not recommended for release in the Green Belt Study (Parcel 18). It is also not supported by the Landscape Study. This is considered to be outweighed by the need to supply suitable employment land close to the A682 and A56 corridor acting as a Gateway site to Rosendale's town of Rawtenstall.

ECNF Comment: We do not support this proposal to use Green Belt for employment purposes when it is clear there is a surplus of employment land. Neither the Green Belt Study nor Landscape Study supports its release. **(See Appendix ECNF-ELR1.)**

Changes to Green Belt from the Regulation 18 Consultation (See Green Belt Topic Paper, page 20.)

1) RBC's comments

A number of Green Belt sites put forward for development in the Regulation 18 consultation held in Autumn 2017 have not been taken forward. In the 2017 consultation 22% of all proposed housing was located in the Green Belt; a total of 786 houses. Additional employment land in the Green Belt was proposed at Rising Bridge.

There was strong local opposition to proposed Green Belt development from local residents in Edenfield, primarily based on the scale of development and the impact on local infrastructure. Over 800 objections were received and a Community Neighbourhood Forum established.

In light of the comments received and additional work undertaken as a result of NPPF the Council looked again at the sites proposed for allocation in the Green Belt, including reviewing them alongside the findings of the Green Belt Study. Wherever possible if a site allocation was contrary to the Green Belt Study it was removed from the proposed Plan. Former allocations that were removed from the Regulation 19 version of the plan include:

Haslam Farm. (HS2.60). 21 houses.

Land at Snig Hole, Helmshore. (HS 2.76). 7 houses.

Land to west of Moorlands View, Edenfield. (HS 2.71). 45 houses.

Rossendale Golf Club. (HS2.79). 15 houses.

Land south of Quarry Street, Shawforth. (HS2.104). 19 houses.

Land east of Tonacliffe School. (HS2.106). 68 houses.

Site off Horsefield Avenue, Tonacliffe. (HS 2.109). 52 houses.

Land adjacent to Hollingate Farm. (EMP 2.38). 4.43ha.

2) ECNF Comments:

RBC list the Green Belt sites removed which are all greenfield sites with no brownfield content (Green Belt Topic Paper, page 20.) The only 100% greenfield site in Green Belt still allocated for housing is H72.

RBC has disregarded the mass of evidence which clearly highlights that site H72 is not suitable for development.

27th August 2019.

Edenfield Community Neighbourhood Forum

Appendix ECNF - GBP 6

Exceptional Circumstances (Green Belt Topic Paper, pages 21 to 26)

To meet housing land requirements through a balanced approach to supply.

- 1) RBC claim (Green Belt Topic Paper, August 2018) that there is a high level of housing need in the east of the Borough and around Rawtenstall and a strong market demand in the south-west of the Borough. The Council refer to a balanced approach (page 21), yet they plan growth in Edenfield of 47% in comparison with 10% for the Borough as a whole. They refer to the south west which includes many areas other than Edenfield but allocate the majority of housing to Edenfield.

They appear to consider the disproportionate level of growth to be a reason to approve the release of Green Belt land.

They claim (page 21) that there is an average housing density of 100 dwellings per hectare on the 23 Brownfield Sites but in reality the figure is 44. They also claim the average density for Brownfield and mixed sites is 75 per hectare but in reality it is 39. The density figures quoted in the summary table on page 22 of the report are also inaccurate in terms of dwellings per hectare. **(For correct figures see Appendix ECNF - GBP 7.)**

RBC claim the development in Edenfield plays an important role in contributing to a balanced housing supply in the following ways:

- It is in the popular south west where there is high demand.
- It gives balance between the east and west of the borough.
- Site H72 is large enough to ensure a mix of housing types and sizes, including affordable provision in an area where affordability ratios are highest.

These three points are an attempt to justify their actions and the use of Green Belt. In reality the south-west covers many areas other than Edenfield including Turn, Helmshore, Stubbins, Strongstry and Chatterton, and most of these areas with the exceptions of Edenfield and Helmshore are having no housing growth whatsoever.

Building a proportion of homes in these other areas would reduce the burden on Edenfield and Helmshore and assist in balancing the east-west supply.

There might be high demand in the south west, but equally there is an identified need for housing in the east and around Rawtenstall.

Additionally, any reasonably sized site can accommodate a mix of housing types and sizes, and indeed RBC have followed this in the past by insisting that sites over ten houses need to have an affordable housing content.

None of the points highlighted above by RBC can be considered to be exceptional circumstances.

2) Address past under-delivery.

It seems incredible that the Council are quoting their past under-delivery as an excuse to utilise Green Belt. We have already identified land for 1,508 dwellings, plus another 439 from the surplus land identified in our Employment Land analysis in addition to possible contributions from large Windfall sites and the 1,207 Empty Homes. The past delivery performance figures are a judgement on RBC and should have no part in justifying the use of Green Belt. The Housing Trajectory data RBC have collated clearly identifies there are no problems going forward with achieving the target and the Lindon Park site would on its own provide the contribution anticipated from H72 for the first eight years.

3) Provision of a balanced employment portfolio in suitable locations for the market.

We have produced an Employment Land analysis to challenge the one put forward by Lichfields/RBC and this proves their land requirement calculations are unsound. In our analysis the Employment Land requirement for the Plan period is 10.72ha which means there is a surplus of more than 20ha, located in many areas around the Borough, from the 30.77ha identified. **(See Appendix ECNF-ELR6, point 8d)**

4) To enable a balanced approach to Housing and Employment.

The calculations by Lichfields in various scenarios show relatively small differences in terms of land requirements for the different levels of house building and the different levels of jobs created. The main factor by far in land requirement calculations relates to the land loss factor and the safety margins. When these two factors are recalculated on a more realistic basis of taking the average over the past ten years, the land requirements are drastically reduced. **(See Lichfields Employment Land Review, Pages 78/79 and Appendix ECNF-ELR1)**

We accept there may be some correlation between housing and employment numbers. However the effect in terms of land requirement is not significant, particularly when RBC have identified 30.79ha with a need for only 10.72ha.

5) Provide a good mix of housing types across the Borough.

A good mix of housing can be achieved on the majority of sites being proposed and surely this cannot be an exceptional circumstance justifying the use of Green Belt in Edenfield or at any other location. RBC in the past has insisted on affordable houses being included on sites with ten dwellings or more. Additionally, the release of the excess land that has been

identified for Employment purposes could improve the availability of sites for mixed developments including apartments.

6) Viability RBC refer to viability being an issue for developers in certain areas. However, the majority of new housing in the Borough is occupied within a very short time after completion. They additionally comment that the high values achievable in the south-west will help to fund infrastructure, but this can also be funded by bringing forward Brownfield and mixed sites, on which higher densities can be expected. The fact that values for residential development in the south-west are higher than in other parts can hardly be described in any way shape or form as an exceptional circumstance.

7) Other Authorities are unable to meet housing/employment need. It is noted that adjoining authorities are unable to assist, but this of itself is no justification for building on Green Belt.

8) Improving the Green Belt.

RBC states Policy HS3e recognises the provision of improved access to Green Belt land will be particularly important with respect to the land to the west of Market Street, Edenfield. The developers of this site will be required to identify how they will address this issue. The same principle will be expected in other Green Belt locations.

RBC has not identified how they would begin to compensate in the remaining Green Belt the removal of a tract with the landscape value of H72. Obviously it is impossible to compensate, as RBC implicitly acknowledge. In a wholly inadequate nod to the NPPF, paragraph 138, the Green Belt Topic Paper, page 26, does no more than offer platitudes: “Exactly how this will be implemented is still an area for consideration” and “Working with a range of partners is likely to be necessary to effectively implement [a SANG]”.

We have proved with our analysis of both the Housing and Employment site allocations that there is no need to use Green Belt for housing or employment purposes. Accordingly, if there is no need to utilise any Green Belt there will be no requirement to improve other areas of Green Belt. It is difficult to understand why RBC would put improving the Green Belt forward under the heading of Exceptional Circumstances when they completely fail to identify what improvements would be made and where and by whom.

9) Other Issues Raised. A56 Robust Border and Masterplan Scheme. These are two further issues put forward by RBC which should not be considered as Exceptional Circumstances. Whilst the A56 divides the Green Belt into easterly and westerly portions there is no justification for removing the easterly portion from the Green Belt. It is not exceptional for a road to run through the Green Belt.

It should be noted also that the Green Belt boundary was first established in 1982 (Topic Paper, page 6) more than 12 years after completion of the A56 Edenfield bypass.

The opportunity to Masterplan the site does not provide justification for removing it from the Green Belt. RBC claim in the Local Plan (page 23 paragraph 59) “Larger developments of fifty dwellings or more will be expected to be guided by Masterplans that take a comprehensive approach to development”. In other words Masterplans relate to the size of the development and have no relationship whatsoever with the Green Belt.

Conclusion

After careful examination of the individual points listed by RBC as exceptional circumstances, it is clear they have been unable to provide any cogent evidence justifying use of Green Belt for housing purposes now or in the foreseeable future.

27th August 2019

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Appendix ECNF - GBP 7

Housing Density Figures.

List covers sites with 50 and 50+ densities.

HSA Reference	Net Developable Area	Number of Units	Density Per Hectare
H1	1.28	64	50
H2	0.02	11	550
H12	2.19	110	50
H20	0.16	16	100
H22	0.2	22	110
H23	0.17	9	53
H24	0.04	7	175
H36	0.15	9	60
H45	0.12	8	67
H46	0.04	8	200
H53	0.4	21	53
H54	0.06	6	100
H55	0.07	11	157
H56	0.06	5	83
H67	0.41	28	68
H73	0.94	47	50
M1	0.09	39	433
	6.4	421	

Average Density per Hectare =

65.8

Brownfield Sites

H1	1.28	64	50
H2	0.02	11	550
H3	0.69	19	28
H12	2.19	110	50
H20	0.16	16	100
H21	0.42	13	31
H22	0.2	22	110
H23	0.17	9	53
H24	0.04	7	175
H35	0.72	22	31
H36	0.15	9	60
H45	0.12	8	67

H46	0.04	8	200
H51	0.16	6	38
H53	0.4	21	53
H54	0.06	6	100
H55	0.07	11	157
H56	0.06	5	83
H65	1.14	49	43
H68	3.7	111	30
H71	0.31	9	29
M1	0.09	39	433
M2	1.56	28	18
	13.75	603	

Average Density per Hectare = 43.9

Mixed Sites

H13	3.2	95	30
H25	1.37	41	30
H37	2.1	63	30
H59	1.95	80	41
H69	0.68	20	29
H70	1.43	45	31
H73	0.94	47	50
M3	0.54	16	30
	12.21	407	271
	12.21	407	

Average Density per Hectare = 33.3

Coimbined Brownfield & Mixed Sites

25.96 1010

Average Density per Hectare = 38.9

28.08.19.