

APPENDIX 1

Information received to support comments on the Rossendale Draft Local Plan (Regulation 18 Consultation)

Individual Reference Numbers

51 - 1431

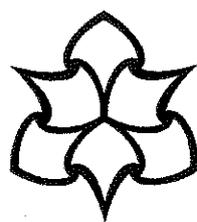
Contents

This appendix includes information we have received from individuals to support their comments on the Rossendale Draft Local Plan which are too large to include in the main body of the report. This information includes photographs, maps and reports and it is organised numerically by the individual reference number for each person. Confidential information including personal addresses, signatures, contact details etc. have been removed.

Individual Reference	Name	Policy or Site Reference	Type of Policy or Site	Site Name (if applicable)	Appendix Number	Page No.
51	John Sikora	Site HS2.54	Housing Site	Land between Newchurch Road and Bacup Road / Land off Newchurch Road / Land to west of Dobbin Lane	1	1
69	P.L. Massey	New site	A site that has not been considered previously	Land off Booth Road	1	18
164	P. and T. Hellowell	New site	A site that has not been considered previously	Field adjoining Todmorden Road	1	20
432	Antony Greenwood	Policy SD2	Urban Boundary and Green Belt	Land behind no. 198 Haslingden Rd	1	23
461	Richard Gee on behalf of Lee Jeys	New site	A site that has not been considered previously	Land south of Lumb Village, Ramsbottom	1	24
490	Richard Gee on behalf of Mr & Mrs Vines, Mrs Jackson and Mrs Preston	Site not allocated	A site that was examined in the SHLAA but that has not been taken forward in the Draft Local Plan	Land at Marl Pitts, Newchurch Road, Rawtenstall	1	31
492	Residents and friends of Townsend Fold	Site HS2.60	Housing Site	Townsend Fold	1	36
498	John Barnes	Site EMP2.15 / Site not allocated	Employment Site / A site that was examined in the SHLAA but that has not been taken forward in the Draft Local Plan	Land north of Hud Hey / Land at Rising Bridge Road	1	60

572	H. Keith Smith	Site HS2.76	Housing Site	Snig Hole, Helmshore	1	63
598	David Trick	Policy SD2	Urban Boundary and Green Belt	Hutch Bank Farm, Flip Road, Haslingden	1	82
615	Elaine Garrard	Sites HS2.11, HS2.12, HS2.13 and HS2.32	Housing Sites	Bankside Lane	1	84
740	Linda Bohan	New site	A site that has not been considered previously	Land at Irongate, Holcombe Road	1	86
944	Andrew Watt on behalf of Britannia Hotels	Site not allocated / New site	A site that was examined in the SHLAA but that has not been taken forward in the Draft Local Plan / A site that has not been considered previously	Land to south of Bar Terrace, Tonacliffe SHLAA16003	1	93
948	David Ashworth	Policy SD2	Urban Boundary and Green Belt	Lomas Lane Rawtenstall	1	94
1018	White Acre Estates, on behalf of Turnbull Prints Ltd	Site HS2.73	Housing Site	Edenwood Mill, Edenfield	1	97
1042	Alan Houghton, AECOM, on behalf of John Lord (LANXESS)	Policy SD2	Urban Boundary and Green Belt	Rising Bridge	1	100
1045	Keith Loughlin	Policy HS2	Housing Site Allocations	Waterbarn Chapel, Rakehead Lane and adjoining land, Stacksteads	1	101
1371	Daniela Ripa	Policy SD2	Urban Boundary and Green Belt	Lower Fold Head Farm, Whitworth	1	105
1388	Steven Hartley on behalf of Stan Ainsworth	Site HS2.49	Housing site	Site at the Glory, Loveclough	1	115
1416	Donna Barber on behalf of Ian Shorrocks	Site EMP2.19	Employment Site	Grane Road Mill. Haslingden	1	117

1431	Christopher Dance	Site HS2.8 / Site HS2.9	Housing Sites	Land south of the Weir Public house / Land west of Burnley Road, Weir	1	124
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**Manchester
Metropolitan
University**

28th September 2017

Dear Oliver

Please find below a short report on the Quaternary glacial infill and associated landslides in the Rossendale Valley between Rawtenstall and Newchurch, as we discussed.

Regards,

Dr. Catherine Delaney

Senior Lecturer
School of Science and the Environment
Manchester Metropolitan University
Chester St.
Manchester M1 5GD.

QUATERNARY DEPOSITS AND LANDSLIDES IN THE UPPER IRWELL VALLEY BETWEEN RAWTENSTALL AND NEWCHURCH

Introduction

The Rossendale Valley between Rawtenstall and Newchurch consists of a bedrock-bounded trough, with an infill of sediments deposited during the last glaciation (the Devensian, 28-14,000BP). This report provides a brief description of the deposits and associated landslides.

1. Quaternary Deposits in the Rossendale Valley

Quaternary deposits within the Rossendale Valley date from the last glaciation. The Valley was covered by ice at the glacial maximum; subsequently ice recession caused the formation of an ice-dammed lake that persisted for some time, before draining during ice retreat (Crofts *et al.*, 2010; Delaney *et al.*, 2010). The lake acted as a sediment sink, and the bedrock valley was partly filled with a mixture of silt, clay, sand and gravel during its existence. Subsequently this infill was incised during lake drainage, and this process continued to a lesser extent during the Holocene (the last 11,000

years). This incision has resulted in a cliff, lying between the north bank of the Irwell River and the Newchurch Road (see figure 1 below).

Between Rawtenstall and Rossendale, boreholes logs along the central axis of the valley (accessible at the British Geological Survey (BGS) GeoIndex site (below)) indicate that glacial sediments to a depth of up to 30m remains in the central part of the valley and consist mostly of silt and clay, with some diamictons. Along the northern margin of the valley, on either side of the Newchurch Road, the sediment is more mixed, with sand and fine gravel interbedded with silt and clay (borehole records from Grange Road, available through BGS GeoIndex). This variable particle size means that the hydraulic conductivity of the sediment changes with depth; in particular beds of silt and clay below beds with sand and gravel present are likely to act as aquitards and slow the downward movement of water, increasing the likelihood of sediment saturation and associated slope failures in this area.

2. Occurrence of Landslides in the Rossendale Valley

Landslides along the southern side of the Rossendale valley in the area were mapped by the BGS (Crofts 2004; Crofts *et al.* 2010). These large landslides are based in bedrock, and are unlikely to be active. Further landslides in the Quaternary infill have also been mapped by the BGS elsewhere in the Valley, using the NextMap Britain™ Digital Elevation Model and some fieldwork (DEM; Crofts, 2004; Crofts *et al.* 2010). The NextMap Britain™ DEM has a resolution of 5m per pixel, so smaller landslides are not easily identified.

For this study LIDAR DTMs (Digital Terrain Models), available on open license from the Environment Agency (website given below) were used to map landslides in the area in question. Airborne LIDAR surveying involves the use of light pulses to accurately measure the height of the ground surface; using this technology height measurements have a vertical accuracy of +/-12cm and a horizontal accuracy limited by the pixel resolution; in this case horizontal resolution is 1m (Environment Agency 2016). As LIDAR pulses can penetrate through tree canopies, the data can be edited to remove buildings so that the ground surface without vegetation and buildings can be shown as a DTM. The resulting DTM has been hillshaded (a model created as if lit by low angle light (35°) from 16 directions around the compass. The result is shown below (Figure 1).

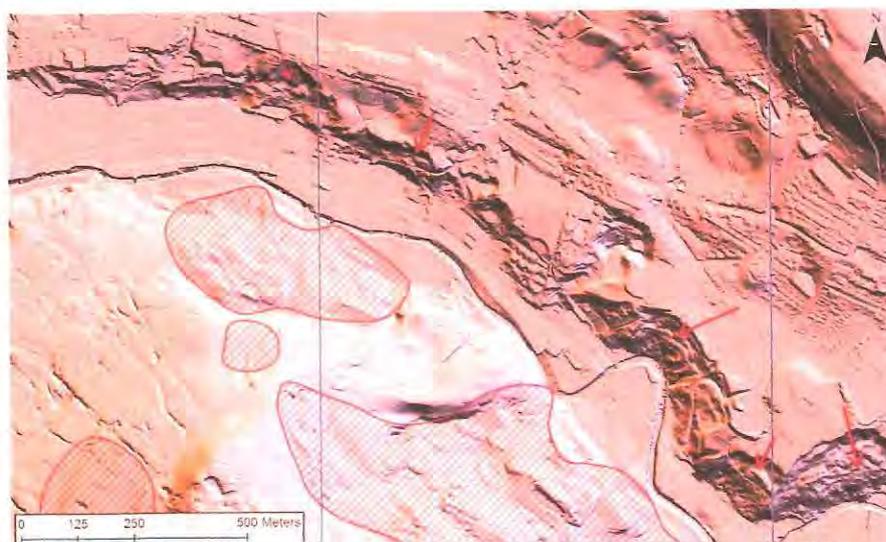


Figure 1: LIDAR DTM (1m resolution) showing Rossendale Valley between Rawtenstall and Newchurch. Landslides mapped by the BGS are shaded with diagonal red lines. Previously unmapped landslides identified using LIDAR are indicated with red arrows.

The image clearly shows the cliff cut into the glacial infill immediately north of River Irwell has been modified by a number of landslides. These are indicated by red arrows in Figure 1, and are characterised by a scarp along the upper margin of the landslide, succeeded downslope by undulating and hummocky terrain. Figure 2 is a closeup of the area proposed for development. There is evidence of a landslide immediately to the east of the proposed development area.

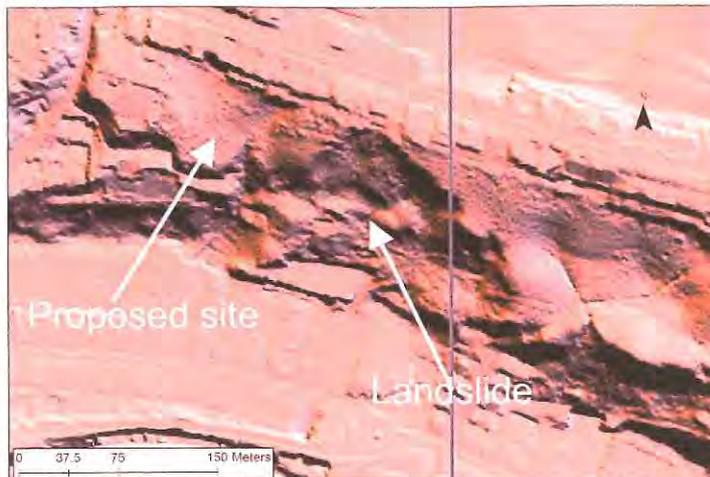


Figure 2: Area around the proposed development, indicating position of landslide. Newchurch Road is visible immediately to the north.

It is not possible to say from the data used in this report whether this landslide is currently active. Even if has not been active in the recent past, it is likely that disturbance of the ground above the slide margins may reduce slope stability and either reactivate this slide or cause further sliding along the southern margin of the site.

I am unable to comment further on the likelihood of slope failure, as my expertise lies in glacial sedimentology and geomorphology, rather than hazard assessment. However, it is clear to me that this site would need considerable investigation prior to any building work commencing, in order to full assess the likelihood of slope failure.

Dr. Catherine Delaney

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References and Websites

British Geological Survey GeoIndex. Available at:

<http://www.bgs.ac.uk/GeoIndex/home.html?sic=10002>. Accessed 28/09/2017

Crofts, R.G., Hough, E., Northmore, K.J. 2010. *1:50,000 Sheet 76 Rochdale Bedrock and Superficial Deposits; Geological Map and accompanying brief explanation*. Natural Environment Research Council.

Crofts, R. G. 2004. Lancashire landslides. Integrated mapping of potential geological hazards. *Earthwise 20*, BGS, NERC.

Delaney C A, Rhodes E J, Crofts R G and Jones C D (2010). Evidence for former glacial lakes in the High Peak and Rossendale Plateau areas, Northwest England. *North West Geography* Vol 10 (1).

Environment Agency (2016). *Environment Agency LiDAR Data*. Technical Note, Version 5.

Environment Agency LIDAR DTMs available to download at:

<http://environment.data.gov.uk/ds/survey/815@vev>

Proposed development of the Greenland site between Newchurch Road and Bacup Road in Hareholme Ward, Rossendale.

Date: 4th July 2017

FAO Rossendale Borough Council Planning Department.

Dear Sir/Madam,

I am writing to you in regards to objecting the proposed planning development of site H13 between Newchurch Road and Bacup Road, Rawtenstall. My family and I have identified a number of pressing issues, which we strongly feel need to be considered. In light of this and after reading these points I am sure you will realise what an outstanding natural asset this site is for the Rossendale valley.

Biodiversity, Geodiversity and Conservation of Ecological Networks considerations.

- The proposed development area consists of over 1000 mature trees, as well as a wide variety of flora and fauna, which provide a rich habitat for wildlife, and crucially is part of the 'green corridor'. This forms a continuous link of natural Greenland between Rawtenstall, Waterfoot and beyond in both directions. This green corridor is currently home to a complex ecosystem with a rich biodiversity of plants and animals, which would ultimately be lost if the proposed development were to go ahead. Furthermore, this area provides a natural link to allow the free movement of wildlife (including a wide variety of nesting birds, deer, bats, fox's and badgers) along this corridor and throughout the Rossendale Valley. **Allowing any building development on this Greenland site will destroy the habitat and eliminate the natural corridor forever. This destruction would ultimately result in the loss of numerous local species of wildlife, plants, trees and fauna that would be nothing less than an act of extreme ecological vandalism.**
- See attached photographic evidence of Badgers taken in August 2015 (on site H13 Hareholme Ward) and extensive range of well-established mature trees and other vegetation. There are currently two very large badgers sets, both of which are currently active and are located at two different locations within the woodland.
- Rossendale Council already recognises the value of this Greenland area/corridor and makes an expressed commitment in various policy documents and core strategy documents to protect **Ecological Networks** and **Biodiversity** areas from any damage. The development proposals if passed would result in the total destruction of this valuable natural habitat. Please refer to the planning Department web site for details of the following policies.
18: Biodiversity, Geodiversity and Landscape Conservation Policy
17: Rossendale's Green Infrastructure
1: General Development Locations and Principles
24: Planning Application Requirements

- Any building development on this Greenland site is in direct contradiction to the Borough Councils declared commitments and would be nothing less than hypocritical and constitute a breach in the Council's declared policy commitments and even worse the trust placed in the Council to manage its affairs in the best interests of the residents and rate payers of Rossendale. Furthermore, the site in question was CPO'd by Rossendale Council in 1983 in order to establish this vital ecosystem within the valley with help from grant aid from the countryside commission. Within the CPO it explicitly states it was granted under s.69 National Parks and Access to the Countryside Act 1949, specifically for the planting of trees on the land and preserving and enhancing its natural beauty. The proposed development is in direct contravention of this.
- Another consideration is that this site contains around 50 Oak trees. Oak trees once formed the main body of the historic forest of Rossendale and there is currently a scheme ran by Lancashire to try and replant these trees to create more oak woodland within Lancashire. To develop this site and dig up these trees would not only harm sites ecosystem but would also be contradictory to the current schemes in place by Lancashire County Council.
- This Greenfield site provides an extremely valuable opportunity for Rossendale people, school children, adults and other groups/individuals to access nature at its best and in the local community. An asset which many other localities cannot offer and is often sought after! This Greenland area is regularly used for this purpose and provides a key natural resource for adult groups with learning difficulties and disabilities.
- The rich and diverse natural habitat needs to be preserved for current and future generations of Rossendale residents.
- Quote from Page 3 of Rossendale Council Biodiversity, Geodiversity and Ecological Networks EN2 Policy; *"The Borough contains three Sites of Special Scientific Interest which are considered to be of national importance and are afforded protection by the Wildlife and Countryside act (1981) due to the significance of the wildlife and geological features within them.....The protection and enhancement of these areas designated or otherwise recognized for their biodiversity importance is paramount and the Council will seek to ensure that all development does not have and adverse impact on biodiversity".*
- Any building development on this richly wooded and mature habitat would be nothing less than ecological vandalism. In the extreme.
- The proposed site was acquired by Rossendale Council and the Council received a EU backed grant to plant trees on this specific site in order to maintain the forest heritage of Rossendale and to create a substantive green corridor for wildlife, and the residents of Rossendale to enjoy. We the residents strongly object to any proposed development on this site. To do so would be in direct contradiction to the Councils expressed policy commitment and also constitute a major betrayal of its

expressed commitment to obtain EU grant funding to plant trees on this land. To do so would be morally hypocritical as well as a denigration of the Councils expressed commitment and responsibilities to maintain this woodland area for the benefit of all Rossendale residents.

Social and Environmental Impact.

- The proposal to build 90+ houses on the Greenland site along with others in the Valley (See planning proposals) will have a major impact on local transport and add to what are already congested roads in the Valley. Particularly Bacup Road and Newchurch Road and especially at peak times adding to journey times and delays.
- The existing local primary schools that would be within the immediate catchment area for any development in Hareholme Ward are already full and have no additional capacity to take in any more pupils.
- Noise pollution, air pollution and light pollution will all be increased in the Valley to the detriment of the health and wellbeing of all local residents. Furthermore, the existing Greenland site already acts and provides a natural store for absorbing the local air pollution. By destroying this area this natural sink is lost.
- Who will pay for the additional schools, nurseries and pressures on other essential services such as demands on health care? Local doctor surgeries are already full and stretched to capacity.
- Maintaining the existing Greenland area is essential to maintaining and preserving the **Character and Aesthetic Appearance of the Rossendale Valley** as a whole.
- We, the people who live in the Valley, have a desire to preserve the current ecological heritage, current character and appearance of the Valley. Preserving the Greenfield site is essential to maintaining character and aesthetic beauty of the Valley.

Demand for new housing and use of designated 'Brown-field' sites

- Who will the new homes proposed under the development plans be for? There is already an abundance of homes for sale in the Valley. All of the current residents of the Rossendale Valley have a home or place to live. Current supply of housing is sufficient to meet local demand. Any new development will simply attract new residents to the Valley who are most likely to be commuters since there is no major new employers, and these new residents will further add to the congestion on local roads.
- There are other Brownfield sites (previously used for industry or resident sites) that need to be priorities as potential areas for development ahead of any development

on virgin Greenland/Greenfield sites. Has Rossendale Borough Council exhausted the prioritisation such areas and if so where is the evidence? Many of you will be able to identify such sites in the Valley and surrounding area that are lying derelict.

- Since all of the existing residents have a home or place to live, who will be the main beneficiaries of developing the Greenland site? It is not the local residents. Providing opportunities for building firms to make vast profits at the expense of local people's interests should **not** feature in Rossendale Borough Council Planning considerations. The proposed development would destroy the already depleted appearance and beauty and the attraction of living in the Valley of 'Green Areas'.
- The Valley has problems selling existing houses for sale due to new ones being built. The proposed housing development will cause more problems and lower the value of existing properties for sale.
- Some of the residents of Newchurch Road and Bacup and houses off of Bacup Road have previously asked the Council if they could purchase the land to extend their gardens and they had their requests refused on the basis that the area had to remain a green belt area.
- The current volume of traffic on Newchrrch road and Bacup road adjacent to the proposed area present a major danger to local residents particularly children and the elderly. To add to this volume of traffic by building residential housing on the current woodland area will significantly increase the risk to local residents of a serious road accident.
- The increase in sport and leisure facilities at Marl Pits has had a major impact on the volume of traffic on Newchurch road and there has already been 1 fatal accident in 2016 and several collisions. The wall at thew entrance to Marl Pits has had to be repaired on at least 2 occasions in the last 12 months due to vehicle collisions.
- The current primary and schools, doctors surgeries and dentists that serve the Hareholme ward are full and have no spare capacity to increase their intake. To build residential accommodation in this area will present a major problem that can not be accommodated by the afore mentioned services.

Geological considerations

- The Greenland site between Newchurch Road and Bacup Road, which has in previous years been referred to as Donkey Fields or Springfields sits on a series of glacial lacustrine deposits of silt, sand and fine clay. These sediments are a result of the sites' former location as part of a large glacial lake with complex outwash fan systems. These features can be clearly seen on the digital elevation models and verified by numerous sedimentological studies. (Delaney et al., 2010; Sikora 2013). If you would like copies of these reports I would be very happy to send them to you.

- Previous comprehensive studies of these sediments by geographers from both Manchester and Durham University have identified these sediments inherent structural weaknesses. (See attached research information and photographic evidence from Manchester and Durham Universities).
- Furthermore, this area is an outlet source for several streams running off the Valley hills to the north of Newchurch Road, resulting in a large amount of overland flow in periods of heavy rainfall. The Council have already recognized the potential problems associated with this overland flow and have acknowledge that these events are only likely to become more frequent and severe in the future due to projected climate change impacts in the region.
- These reasons combined together have rendered the whole of the Greenland area inherently unstable and prone to subsidence. This is precisely why the Council planted the area with trees some 30 years ago in order to stabilise the ground and reduce the risk of subsidence. This strategy has been successful and has created the rich and diverse habitat for wildlife that we all want to preserve. Any change to this area would be a complete reversal of Council policy.
- What happened to the proposals and European Funding for a designated 'Green Walk Around the Valley'? The Greenland area between Bacup Road and Newchurch Road is a key part of this plan.
- Due to the inherent geological formations and natural water channels any building on this land will run the serious risk of causing subsidence which will bring with it law suits on the Council and Builders from local residents.

Central Government Pressures

- The blanket recommendations issued by Central Government to all Local Government Authorities regarding the volume of new homes that need to be created do not take into consideration any variations in regional and local circumstances. Population pressures in the south east region are vastly different to those in Rossendale. Blanket recommendations **NEED TO BE CHALLENGED**.
- Rossendale Borough Council has a duty to protect the interests of the existing local residents it serves (its rate payers) and not people that do not live in the Rossendale Valley.
- As a local resident that has lived in the Valley for 43 years, I am strongly opposed to the proposed development of any building on the fragile, delicate and very valuable ecological habitat that currently exists on site H13 in the Hareholme Ward. These concerns are also shared by my family and all of the local residents adjoining the proposed development on site H13.

Alternative sites

- I am aware of numerous brown-field sites in the Valley that do not feature on the Councils Draft Local Plan. It would be a good idea if the Rossendale Borough

Key

- Ice flow direction →
- Estimated ice margin - - -
- Estimated former lake extent ■
- Subaqueous Outwash Fan ■

- Ba=Bacup; Eb=Ewood Bridge; Ha = Haslingden; Hm=Hugh Mill; Ra= Rawtenstall

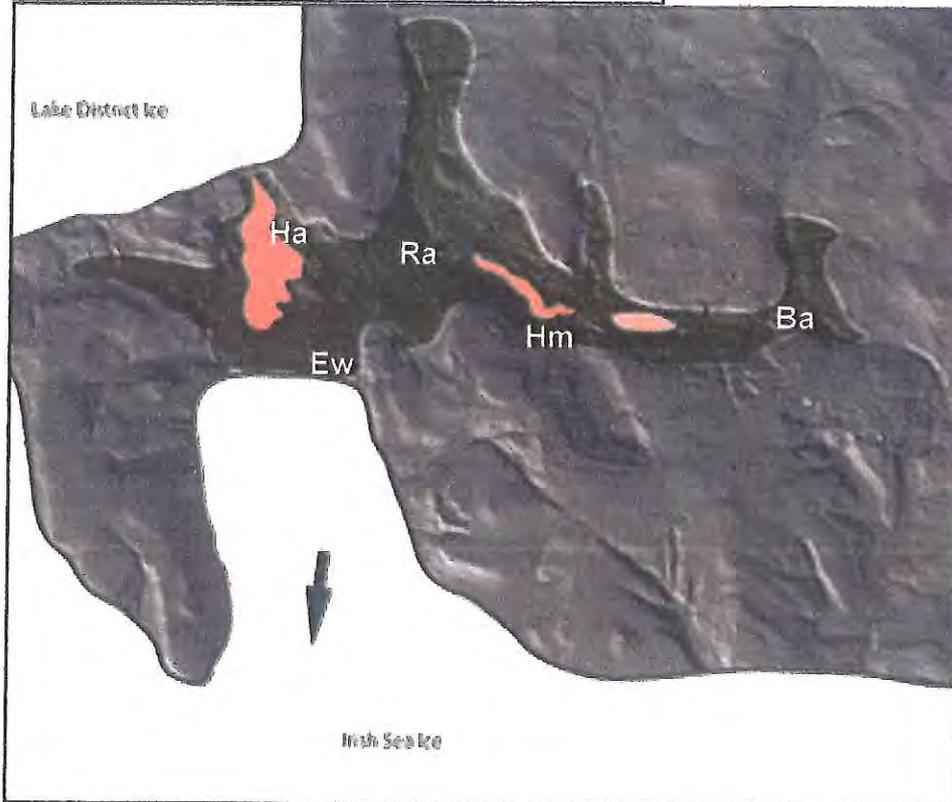


Diagram showing a suggested model for the final phase of retreat of ice in the Rossendale Valley circa 20,000 years before present (Sikora, 2013). Note the line of sand and gravel in the middle of the model which corresponds with the proposed development of the Hareholme site between Newchurch road and Bacup Road.



Picture of an exposure taken from the Rossendale Valley showing the high density of sands and gravels which are likely to be located in abundance throughout the proposed development site of between Newchurch Road and Bacup Road. Notice the profuse amount of water gushing out through the gravels at the bottom of the picture, which was expunged once the pressure was released through opening the exposure. These glacialacustrine and glacialfluvial sediments are highly unstable once exposed and would result in severe subsidence to the surrounding area.

Council Planning Department invited the local residents to identify suitable alternative sites, and I am sure that the local residents would identify sufficient more suitable sites that can be used for housing. The Council only has to ask. Personally I have already identified more than 10 different sites that collectively add up to a greater area than the H13 greenfield site.

Figures



List of Wildlife
Seen regularly in the woodland area between Newchurch Road and Bacup Road
(Local Plan site H13)

Badgers
Bats
Grey Squirrels
Fox
Deer
Field Mice
Buzzard
Kestrel
Nuthatch
Canada Goose
Mallard
Cormorant
Heron
Barn Owl
Tawny Owl
Wood Pigeon
Stock Dove
Collared Dove
Raven
Carrion Crow
Jackdaw
Magpie
Jay
Green Woodpecker
Great Spotted Woodpecker
Black-Headed Gull
Long-Tailed Tit
Coal Tit
Blue Tit
Great Tit
Wren
Goldcrest
Sparrow
Duncock
Robin
Chaffinch
Goldfinch
Bullfinch
Greenfinch
Song Thrush
Mistle Thrush
Blackbird
Grey Wagtail
Pied Wagtail
Twite
Siskin

ROSSENDALE BOROUGH COUNCIL

THE BOROUGH OF ROSSENDALE (LOWER CLOUGHFOLD, TREE PLANTING SITE)

COMPULSORY PURCHASE ORDER, 1983

BOROUGH OF ROSSENDALE
COMPULSORY PURCHASE ORDER

THE NATIONAL PARKS AND ACCESS TO THE COUNTRYSIDE ACT, 1949 AND THE ACQUISITION OF LAND ACT, 1981

THE BOROUGH OF ROSSENDALE (LOWER CLOUGHFOLD, TREE PLANTING SITE)
COMPULSORY PURCHASE ORDER, 1983

Rosendale Borough Council hereby make the following Order:-

1. Subject to the provisions of this Order, the said Rosendale Borough Council are under Section 89 of the National Parks and Access to the Countryside Act 1949 hereby authorised to purchase compulsorily for the purpose of planting trees on land in their area for the purpose of preserving or enhancing the natural beauty thereof the land which is described in the Schedule hereto and is delineated and shown coloured pink on the map prepared in duplicate, sealed with the Common Seal of the said Rosendale Borough Council and marked "Map referred to in the Borough of Rosendale (Lower Cloughfold, Tree Planting Site) Compulsory Purchase Order, 1983". One duplicate of the map is deposited at the offices of the said Rosendale Borough Council and other is deposited at the offices of the Secretary of State for the Environment.

2. In relation to the foregoing purchase Parts II and III of Schedule 2 to the Acquisition of ~~Land~~ ^{Land} Act 1981 are hereby incorporated with the enactment under which the said purchase is authorised. ^(Support)

~~Act 1981 are hereby incorporated with the enactment under which the said purchase is authorised subject to the~~

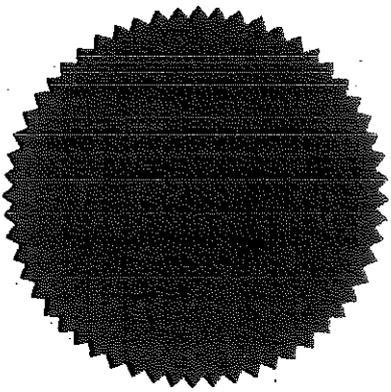
~~modifications that references in the said Section to the Company shall be construed as references to the said Rosendale Borough Council and references to the railway or works shall be construed as references to the land authorized to be purchased or any buildings or works constructed or to be constructed thereon.~~

3. THIS Order may be cited as The Borough of Rosendale (Lower Cloughfold, Tree Planting Site) Compulsory Purchase Order, 1983.

SCHEDULE

<u>Extent, description and situation of the land</u>	<u>Owners or Reputed Owners</u>	<u>Lessees or Reputed Lessees</u>	<u>Occupiers (other than tenants for a month or less)</u>
5.2 hectares (12.5 acres) of land or thereabouts situate at Lower Cloughfold Rautenstall Rosendale Lancashire and lying to the south of the dwellinghouses numbered 107-183 (odd numbers inclusive) Newchurch Road, Rautenstall (central point map reference SD 820228)	Wilton Rhodes, c/o Messrs. J.V. Pilling & Co., 3 Irwell Terrace, Bacup, Lancashire.	T.R. Clayton (Rosendale) Limited, Wood Top, Bury Road, Rautenstall, Rosendale, Lancashire.	Jeffrey Rhoads, c/o Messrs. J.V. Pilling & Co., 3 Irwell Terrace, Bacup, Lancashire.

THE COMMON SEAL of Rosendale Borough Council was hereunto affixed this 20th day of June, 1983 in the presence of:-



DET 2197

The Secretary of State for the Environment hereby confirms the foregoing Order subject to the modifications shown in red ink therec

Signed by authority
of the Secretary of
State.
24 March 1983

A Senior Executive Officer
in the Department of the
Environment.



For the attention of

Dear Sir

Further to our brief conversation at the Open Day held at Futures Park on February 4th to consider the Draft Local Plan.

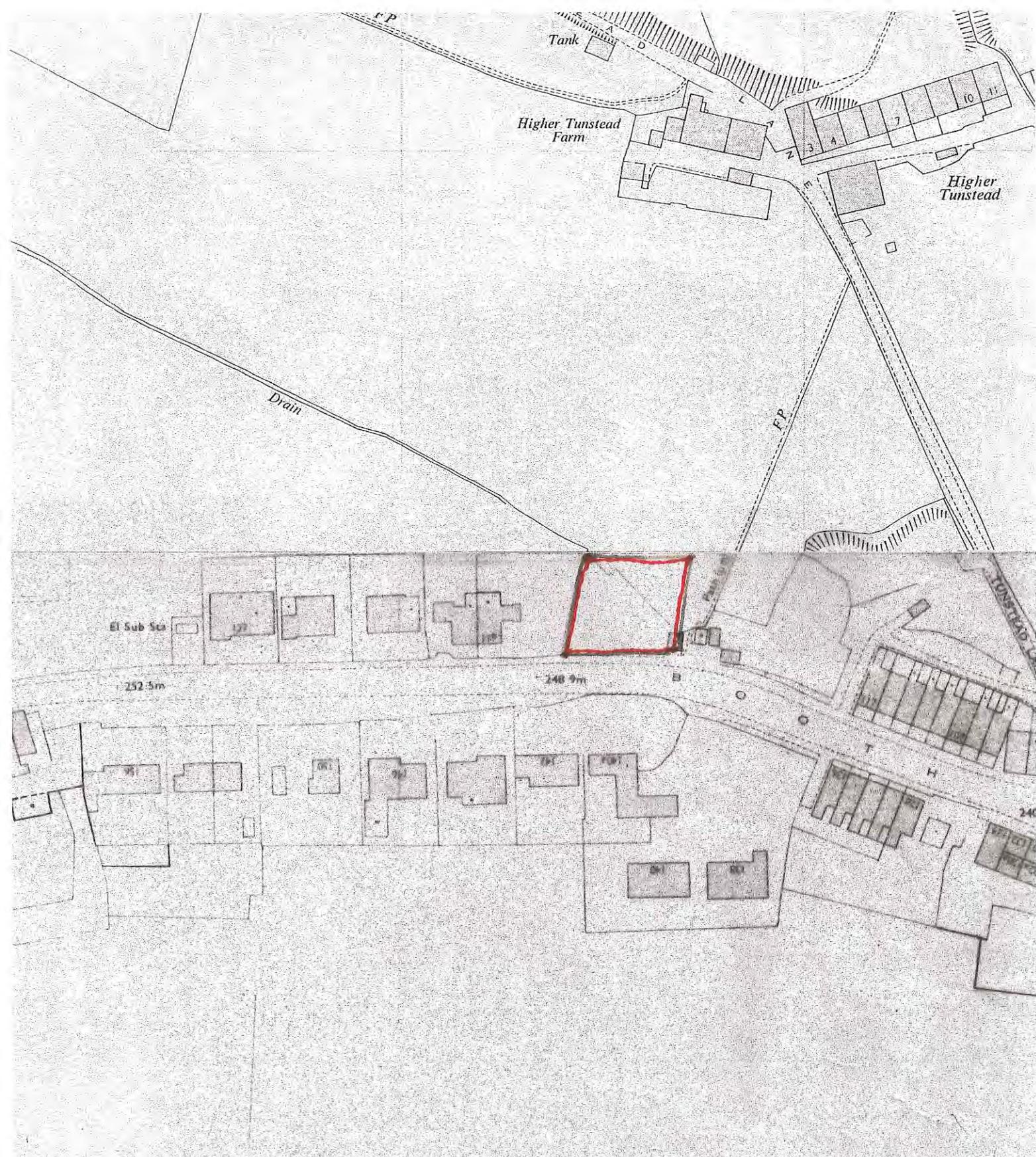
I enclose a plan of the plot of land I referred to situated on Booth Road.

I submitted an outline planning application for this site in January 1992. When I was informed that the land was within an area of green belt and therefore the application was refused.

I would suggest that it is now not perhaps appropriate that this strip of untidy and derelict land between two blocks of existing housing should remain undeveloped particularly as the current draft local plan is considering possible sites for future housing.

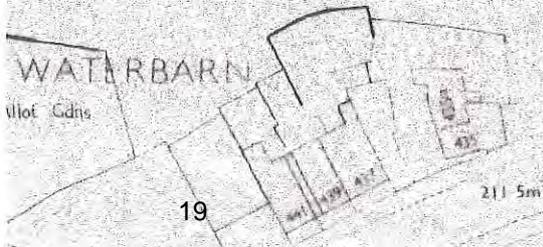
I would be pleased if you could give consideration to the site being included for housing in the local plan and I look forward to receiving your comments on this possibility.

Yours faithfully,



BOROUGH OF ROSSENDALE

Reproduced from the 1:1250 Ordnance Survey
 1989 map with the permission of the
 Controller of Her Majesty's Stationery Office,
 Crown Copyright Reserved. Licence No. LA 07300



STACKSTEADS

Planner,
Rossendale Borough Council,
Planning Dept.,
Kingfisher Centre, BACUP, Lancs.,
OL13 0BB

Todmorden Road,
Stacksteads, BACUP,
Lancashire, OL13 9TY.

30th August, 2017

Dear

Thank you for your time on the telephone earlier today.

Following our conversation and as promised, I am enclosing an indicative plan of our field adjoining Todmorden Road. It has the benefit of straightforward and uncomplicated access from Todmorden Road and so it appears to make sense to consider its inclusion in your latest consideration of potential for housing and is right next to land already included in the recently published long range plan for the Borough's housing needs. The difference is that our field is much more accessible.

I should add that access to Bull Hall Barn's field would, I imagine, involve partial use of the very narrow lane to Bull Hall. That also raises the difficulty of a high, collapsing retaining wall supporting the lane behind the 2 semi detached houses(Chapel Villas). That lane is at a raised level and directly looks towards the rear bedrooms of the two houses just a few feet distant and at the SAME level.. You could expect an understandable concern by the owners of both houses on both material counts. That alone may merit a planner visiting to inspect these predictable issues.

Please acknowledge receipt and we'd love to hear whether and how we might progress our suggestion. If so we would approach our lessor who we believe may be interested in collaboration.

Kind regards,

Philip + Tilly Hellowell



BULL HALL BARN

BULL HALL

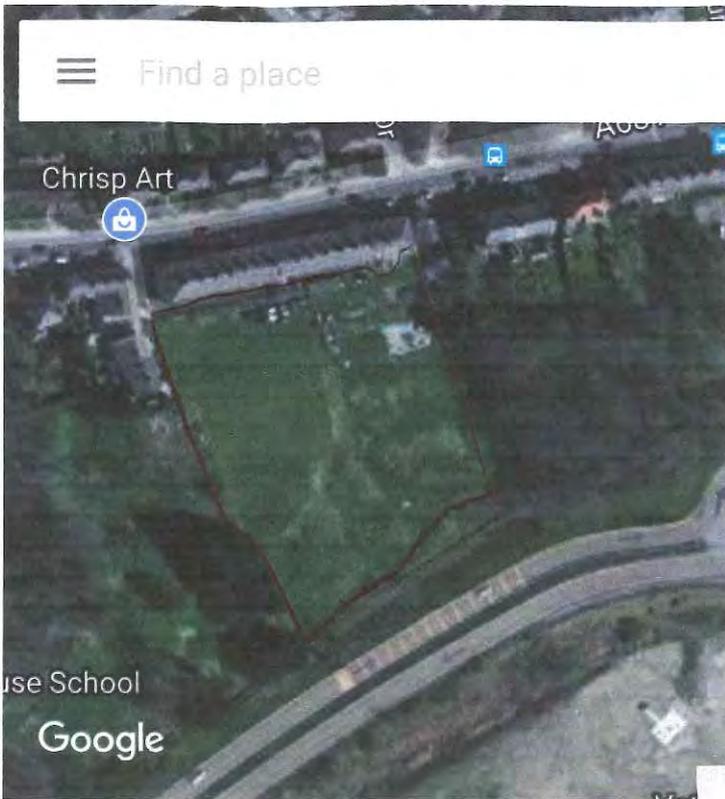
BULL HALL BARN'S FIELD

COLLAPSING RETAINING WALL + EYE LEVEL, CLOSE VIEW INTO REAR BEDROOMS

ENTRY TO OUR FIELD

OUR LEASED 1/2 ACRE FIELD

OWNED BY MR/MRS STAFFORD



Land to the rear of 198
Hastingsden R.D Rowkerstall
Antony Greenwood
antonygreenwood3@gmail.com

I would like this to be
included in the new
Urban boundary please.

could you please add
me to the consultation database

Thank you



Head of Planning
Rossendale Borough Council
Room 121
The Business Centre
Futures Park
Bacup
OL13 0BB

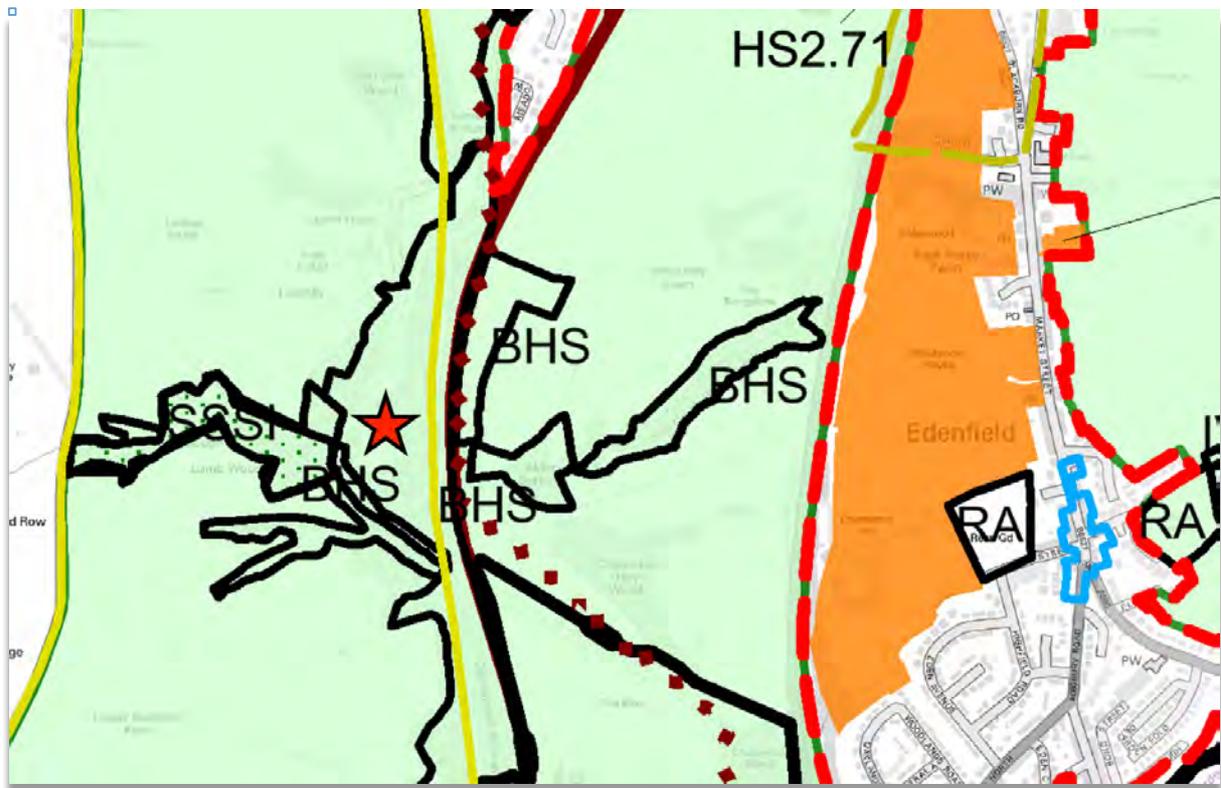
Our Ref: RG/G267L001
Date: 5 September 2017

Email: forwardplanning@rossendale.gov.uk

Dear Sir / Madam

**Representations on Emerging Local Plan
Land south of Lumb Village, Ramsbottom, Bury, Lancashire**

We are instructed by **Lee Jeys** to submit these representations objecting to the omission of his land as a housing allocation for up to 5 dwellings in the emerging Local Plan. A site location plan accompanies these representations, and the site's location is marked (very crudely) by the red asterisk on the extract from the draft Proposals Map below.





Mr. Jeys' land is well known to the Council and has recently been the subject of an allowed appeal in respect of a timber building constructed for the purposes of working and storing wood (ref: APP/B2355/C/15/3139574).

We contend that this is a brownfield site that ought to be released from the Green Belt and allocated for up to 5 houses.

In the spirit of openness, we acknowledge that the appeal Inspector presented a contrary view concerning the status of the land in her paragraph 16 :

'The Council takes issue with the contention that the land is a previously developed site. Whilst the site in the past accommodated several buildings, including a mill, these buildings were demolished in the 1990's. Over the years the land has become largely covered over by vegetation and has the character and appearance of woodland, open clearings and riverbanks. Whilst there is some evidence of foundations, fragments of walls, roads and hardstandings these industrial remains are such that they have blended into the landscape. Having regard to the definition of "previously developed land" at Annex 2 to the Framework I am inclined to agree with the Council that the site cannot be regarded as previously developed land.'

Notwithstanding that, we continue to maintain that the land is previously developed and that the Inspector's judgement in that regard is flawed. Inspectors can and do of course reach incorrect judgements, as evidenced by a long series of legal challenges that have overturned appeal decisions.

Our client's stance is that much of his land is indisputably brownfield. Very large expanses of stone and concrete foundations and walls are evident, and while the site may appear verdant in parts, that is very much around its periphery. The Council presented historic photographs of the site as part of its appeal evidence, which offered the appearance of dense woodland on the site. What those photographs do not reveal is that that 'greenery' was little more than a sea of Himalayam Balsam and small, poor quality self set saplings struggling to grow through narrow gaps in the foundations of the former mill. It is also worth highlighting that our client operated on the advice of the Forestry Commission, and associated correspondence was presented in support of the above appeal.

It is also worth highlighting that Himalayam Balsam is an invasive weed, and carries a particular threat close to rivers and streams (as in this case). The following advice is reproduced from the website of the Royal Horticultural Society :

What is Himalayan balsam?

Introduced to the UK in 1839, Himalayan balsam is now a naturalised plant, found especially on riverbanks and in waste places where it has become a problem weed.

Himalayan balsam tolerates low light levels and also shades out other vegetation, so gradually impoverishing habitats by killing off other plants. It is sometimes seen in gardens, either uninvited or grown deliberately, but care must be taken to ensure that it does not escape into the wild.



Appearance

Himalayan balsam is a tall growing annual, 2-3m (6-10ft) in height. Between June and October it produces clusters of purplish pink (or rarely white) helmet-shaped flowers.

The flowers are followed by seed pods that open explosively when ripe.

The problem

Each plant can produce up to 800 seeds. These are dispersed widely as the ripe seedpods shoot their seeds up to 7m (22ft) away.

The plant is spread by two principal means;

- The most widespread distribution tends to be by human means where individuals pass on seed to friends
- Once established in the catchment of a river the seeds, which can remain viable for two years, are transported further afield by water

As such, while our client has openly cleared parts of his land, it is important that the LPA does not labour under the impression that he has removed a rich Tolkeinesque ancient woodland. He has simply sought to remove a serious, unattractive and dangerous problem, which if left would have spilled out into the adjacent countryside and further downstream.

Notwithstanding any debate about greenfield versus brownfield (and bearing in mind that the Council is in the process of proposing the release of far larger and greener / more attractive swathes of Green Belt land elsewhere in the Borough), we suggest that the site is ideally suited for a small, bespoke, high quality housing scheme – up to 5 large detached dwellings of excellent design and strong sustainability credentials. Such a development would not only make a meaningful and much needed contribution towards Rossendale’s housing land supply, but it would also efficiently and sustainably reuse what we continue to maintain is brownfield and unsightly land, and could cross subsidise environmental improvements through tree and ecological mitigation and maintenance.

The site barely fulfils any meaningful Green Belt function. Aside from being barely visible, it is unattractive in appearance, with large expanses of concrete, stone footings and remnants of walls and other structures. Public views towards the site from the wider Green Belt are very limited / glimpsed, such that the site does not read as part of the wider open landscape or countryside. It is essentially a self contained mini-parcel that does not fulfil a wider Green Belt role, and - unlike some of the other sites that are being proposed by the Council for release - it is not readily visible from wider vantage points and does not fulfil the purposes of Green Belt designation.

Considering the five purposes of the Green Belt as set out in the NPPF, we comment as below :

To check the unrestricted sprawl of large built-up areas

A small, discrete and high quality housing scheme would not result in the unrestricted sprawl of a large built up area. The site is an ideal site for release from the Green Belt, for reasons of its self-



containment; its relationship with Lumb as a small but sustainable settlement; its clear, defensible boundaries; and its lack of overall visibility. The careful and sensitive design of much needed homes, with substantial areas of open space that adjoin the adjacent Green Belt could not sensibly be seen as 'urban sprawl'.

To prevent neighbouring towns merging into one another

We acknowledge that – in two dimensional (plan) form - the wider parcel of Green Belt (of which the site forms a minute part) plays an important role in preventing the merging of built up areas, but the specific role the application site plays in that is negligible, and certainly when the site and context is considered in three dimensions. The erection of up to 5 houses on the site (having regard to its limited visibility and substantial boundary features) will be barely perceptible when considering both the actual and perceived gap between settlements.

To assist in safeguarding the countryside from encroachment

The site does not read as part of the wider countryside, partly because of its poor and largely brownfield condition, and partly because it is barely visible from any public vantage point. Building houses on this site would not therefore constitute material encroachment into the countryside.

To preserve the setting and special character of historic towns

The site does not fulfill any role in preserving the setting or character of any town.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

It is very evident that, while the emphasis correctly remains on reusing brownfield land, there is insufficient brownfield land to accommodate the future needs of the Borough. The extremely low brownfield target (20%) set out in the emerging Plan is testament to that, as is promotion of sizeable Green Belt sites across the Borough. The emerging Local Plan recognises that :

'Previously developed (brownfield land) has been identified wherever possible but the supply of sites without significant constraints within urban areas is limited.'

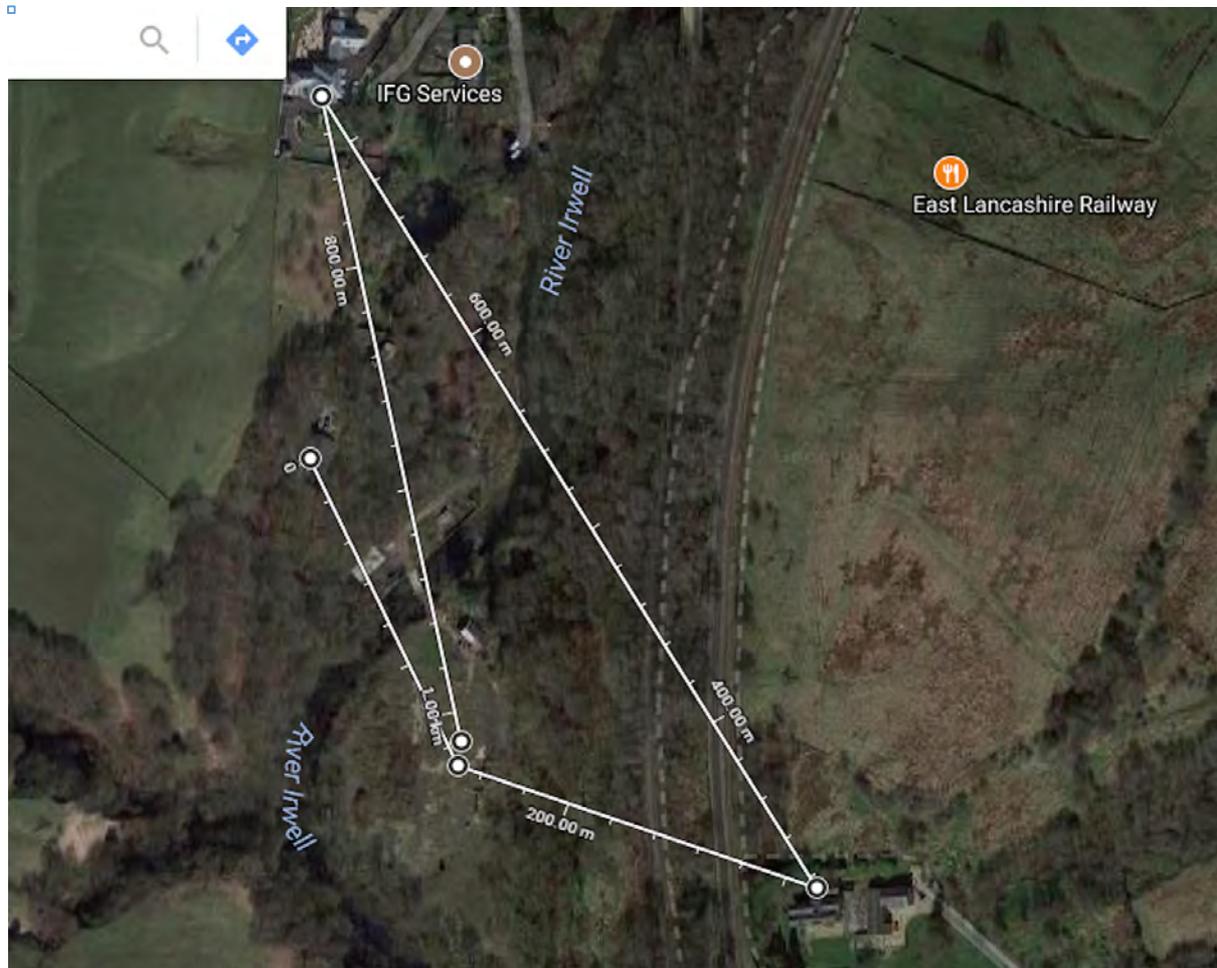
As such, we contend that retaining the application site within the Green Belt plays no part in the encouragement of the recycling of derelict or other urban land.

In conclusion, we contend that the site is an excellent site for release in respect of its self-contained nature; its clear defensible boundaries; its relationship with the established residential area (Lumb); its relative lack of constraints; its modest scale and the modest amount of new houses proposed (up to 5 homes); its lack of visibility from the wider Green Belt and most public vantage points; and in turn the limited extent it 'reads' as part of the wider Green Belt in respect of its openness.

We anticipate that the LPA might point to §55 of the NPPF, which indicates that new housing should not be approved in 'isolated' locations. We suggest that the site should not be viewed as isolated in



the true sense, simply because it does not form part of a settlement. The site was, of course, home to a major mill that was constructed close to homes for its workers. The site has a ready made vehicular access well suited to serve a small number of homes.



The aerial image above shows the site in relation to the settlement of Lumb (to the north). The 100 metre line marks the distance from the centre of the site to what we understand to be a recently built new dwelling approved under application ref: 2014/0335 at Vale Lodge, Lumb. While we have failed to extract the details of that application from the Council's website, the following description confirms that a new dwelling was approved in this location :

*'Demolition of part of existing dwelling house and **construction of proposed new detached dwelling** while retaining remainder of Vale Lodge as a separate detached dwelling. (Design and details of proposed detached house as approved scheme 2014/0127) [approved on 7 October 2014].*

The relevance of that planning permission is that the LPA clearly did not consider that new dwelling at nearby Vale Lodge to be in an 'isolated' location. Had it done so, that application would have been refused. Our client contends that his land is no more or less 'isolated' than Vale Lodge.

The aerial image above also shows the proximity of the site to the closest property in Edenfield (marked by the 200 metre annotation).



Our client's site is served by mains water immediately at its periphery, with an electricity transformer. Foul sewerage could readily be accommodated in septic tanks, and we understand that the current nearby cottages pump their foul up to a treatment plant. We therefore suggest that this site should not be considered 'isolated'.

The site is readily available and owned by a single willing owner, and is ideally suited to accommodate the type of housing required in Rossendale within the next 5 years, as is recognised by the emerging Local Plan :

'The SHMA particularly highlights a need for larger, aspirational property types in Rossendale to rebalance the stock away from small terraced properties and reduce the high levels of outmigration to adjoining areas.'

We therefore request the Council to give due consideration to the release of this site from the Green Belt and its allocation for up to 5 houses.

We look forward to confirmation of receipt and validation of these representations, and please do not hesitate to contact Richard Gee at these offices if anything further is required.

Yours faithfully
for Roman Summer Associates Ltd

Richard Gee
Director

SHED AT LUMB Ref: 2014/545

5045

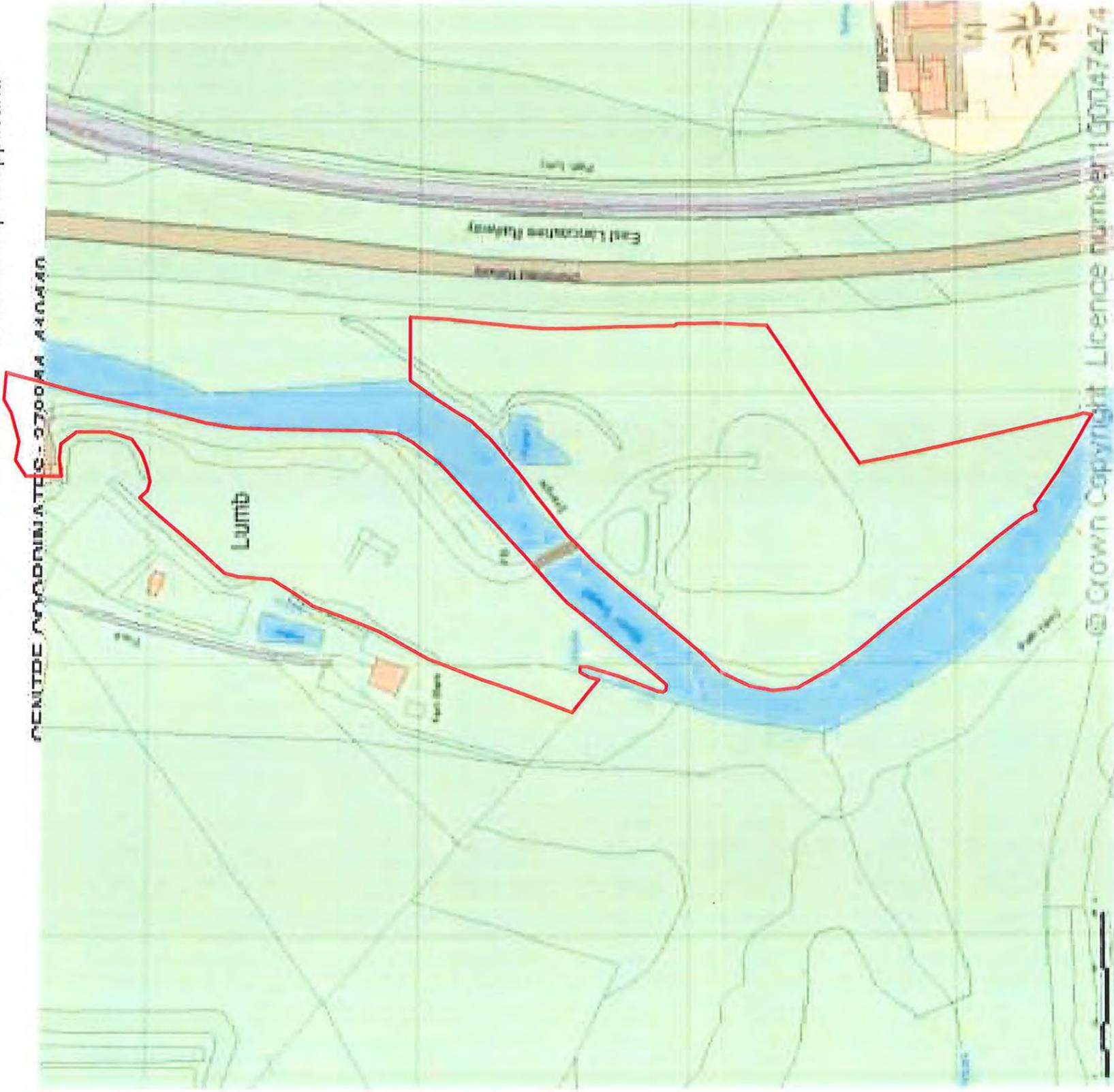


SITE LOCATION PLAN

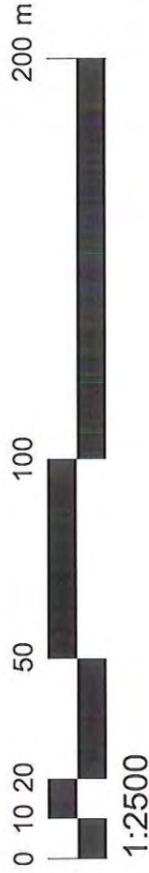
AREA 16 HA

SCALE 1:2500 on A4

Red line indicates parcels of land in ownership of applicant.



LUMB MILL
LOCATION PLAN
Scale 1:2500



Approximate areas;

North West parcel = 10,868 m² i.e. approx. 1.08 ha

South East parcel = 17,848 m² i.e. approx. 1.78 ha

total = 2.86 ha



2014/545

Supplied by Streetwise Maps Ltd

www.streetwise.net

LICENCE No: 100047474

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Head of Planning
Rossendale Borough Council
Room 121
The Business Centre
Futures Park
Bacup
OL13 0BB

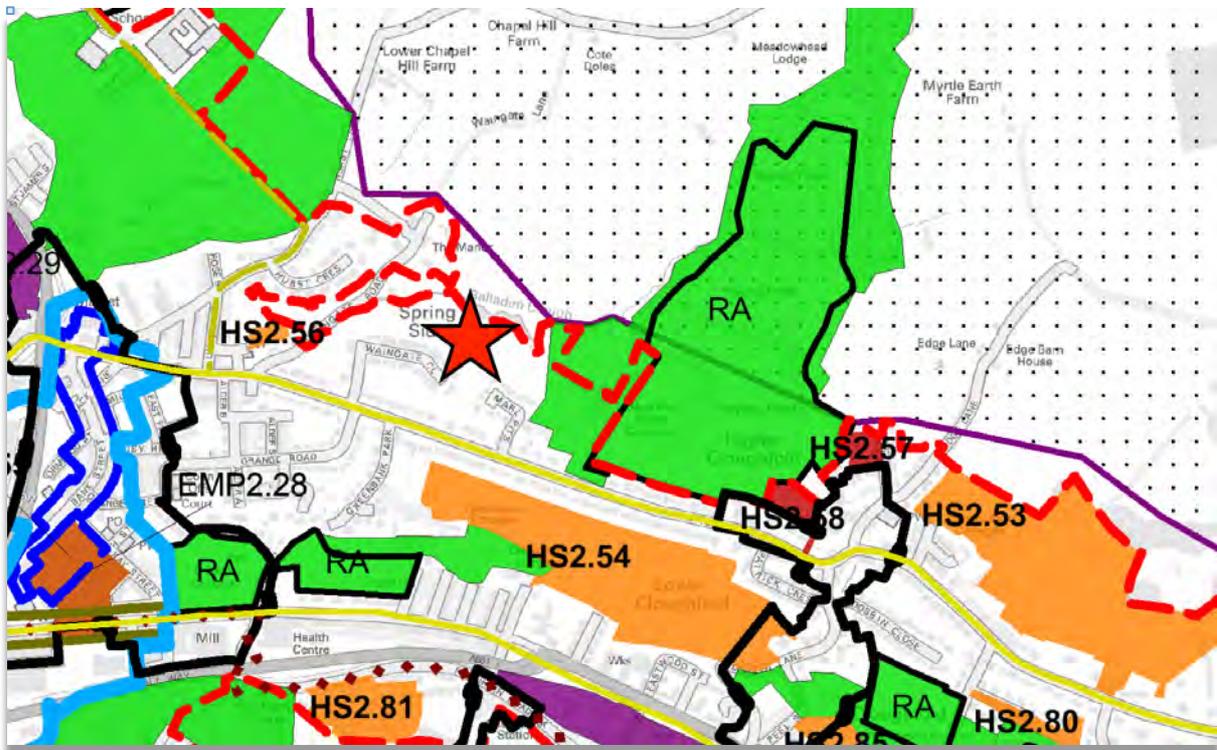
Our Ref: RG/G267L001
Date: 5 September 2017

Email: forwardplanning@rossendale.gov.uk

Dear Sir / Madam

**Representations on Emerging Local Plan
Land at Marl Pits, Newchurch Road, Rawtenstall**

We are instructed by *Mr M Vines, Mrs K Vines, Mrs L Jackson and Mrs A Preston* (as joint owners) to submit these representations objecting to the omission of their land as a housing allocation in the emerging Local Plan. We contend that this is an accessible and sustainably located site that ought to be allocated for up to 60 dwellings. The site's location is marked (very crudely) by the red asterisk on the extract from the draft Proposals Map below.



A separate location plan is enclosed, as produced by RGP Architects (drawing ref: 04). That shows the full and precise extent of our client's landownership, and superimposes the proposed settlement

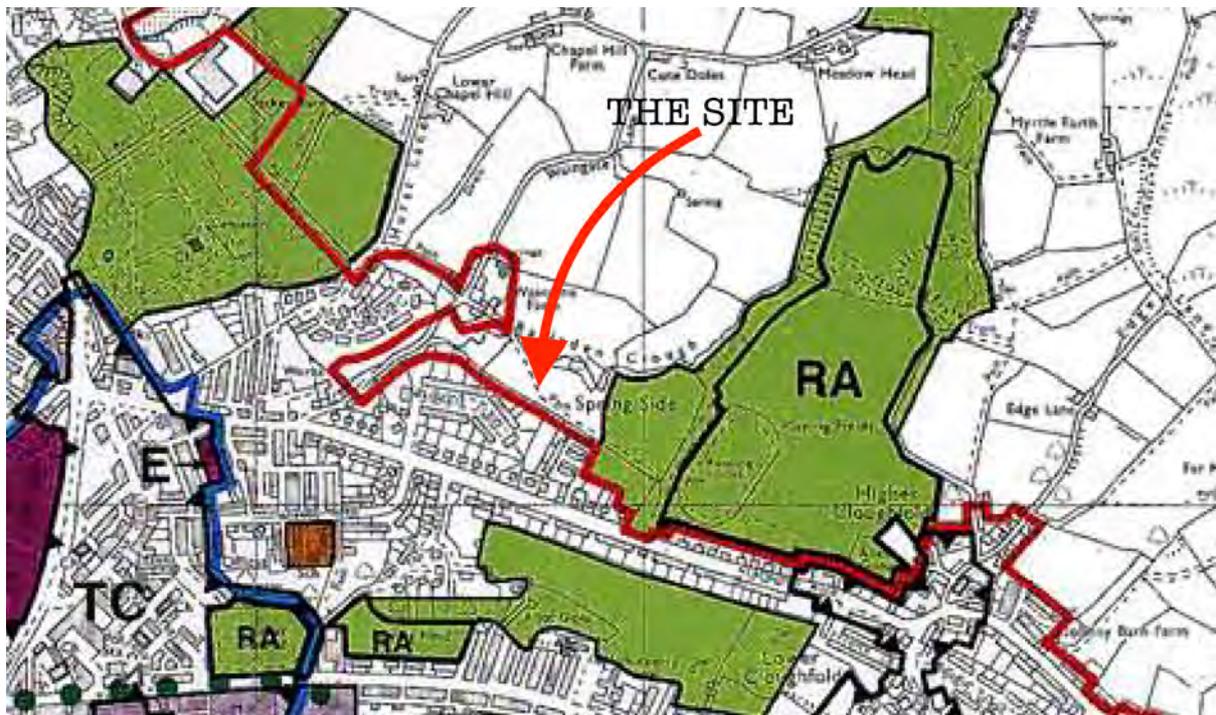


boundary extracted from the draft Proposals Map. It will be noted on the RGP drawing that almost the entirety of our client's land falls within what is proposed to be the amended settlement boundary. That is welcomed by our client.

This is clearly an excellent housing site. It is located sustainably on the edge of the built up area, close to established housing of good quality and value. The fact that the site *currently* falls just outside the defined settlement boundary is noted, but so too is the proposed 'extension' of the settlement boundary on the draft Proposals Map to include the overwhelming majority of our clients' land. That 'extension' is welcomed and supported, but our clients maintain that that represents only stage one of what ought to be a two stage process – namely that the site calls to be allocated specifically for housing (in much the same way that the Council has treated other comparable sites – for example, nearby site ref: HS2.53).

It is worth noting that highways-related advice from DTPC has confirmed that – from a technical perspective – a safe and efficient access into the land can readily be delivered.

In the Core Strategy (CS), the site does not fall within any designation. The Proposals Map extract below marks the site (red arrow), and it will be seen that it falls just outside (to the north of) the defined Urban Boundary (marked by the dark red line). The eastern section of the site falls within the large green area associated with the leisure centre.



Policy 2 of the Core Strategy outlines the housing requirement in Rossendale over the plan period, with a target of 247 dwellings per year stated. In the CS, the aim is to achieve 65% of new residential development on previously developed land (PDL) (and so, by definition, 35% will be on greenfield sites), and encourage higher density development (50+ dwellings per hectare) in sustainable locations, including those within or adjacent to Rawtenstall. A minimum density of 30 dwellings per hectare across the borough will be expected.



In that regard, it is interesting to note that the draft Local Plan is suggesting a much lower 20% target for brownfield land, which is further recognition of the need to release greenfield land if the Borough's housing needs are to be accommodated. Our client contends that the Council ought to be releasing their site in advance of the numerous Green Belt and other arguably less sustainable sites that are being promoted for housing elsewhere in the draft Plan.

The site was of course considered as part of the Council's *Strategic Housing Land Availability Assessments 2015*, and as the assessment form demonstrates that – in spite of scoring a '0' for access as "a major constraint" (which we consider to be incorrect, based on dedicated highways advice from DTPC) – it was proposed to be allocated for housing as a 'Phase 2' site. That assessment / conclusion is clearly helpful in taking matters forward, and is a further reason why this land should be the subject of a housing allocation in the Local Plan.

SITE ASSESSMENT SHEET	SITE AREA: 1.8 HA
SITE REF: RCGL59	ALLOCATION: ALLOCATE FOR HOUSING (PHASE 2)

Site Location: Land to Rear of Waingate Close, Springside

Name of Appraiser: AS

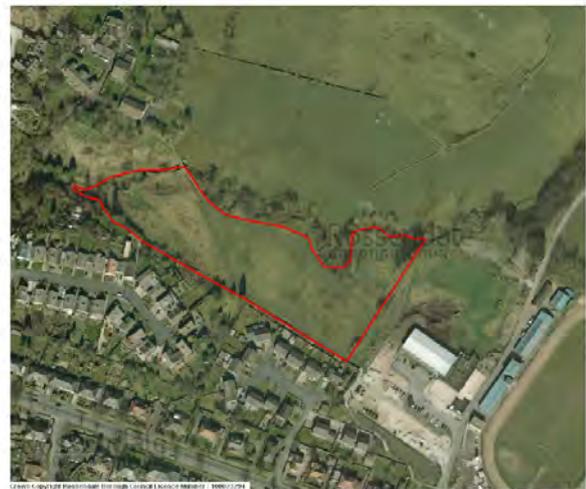
Area Vision Location: RCGL

Date of Appraisal: 23/2/2015

(54 Dwellings)

Site Map

Aerial Photograph



The site is ideal to accommodate the type of housing required in Rossendale, as is recognised by the emerging Local Plan :

'The SHMA particularly highlights a need for larger, aspirational property types in Rossendale to rebalance the stock away from small terraced properties and reduce the high levels of outmigration to adjoining areas.'



We therefore request the Council to give due consideration to the allocation of this site for up to 60 dwellings. We look forward to confirmation of receipt of these representations, and please do not hesitate to contact Richard Gee at these offices if anything further is required.

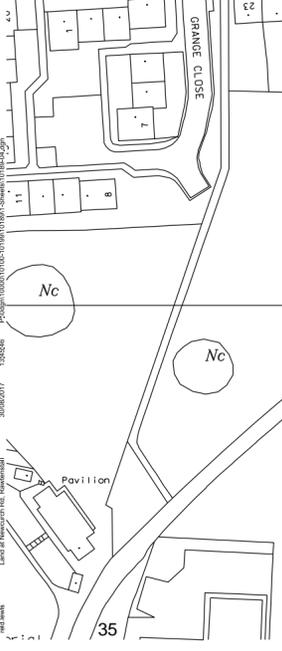
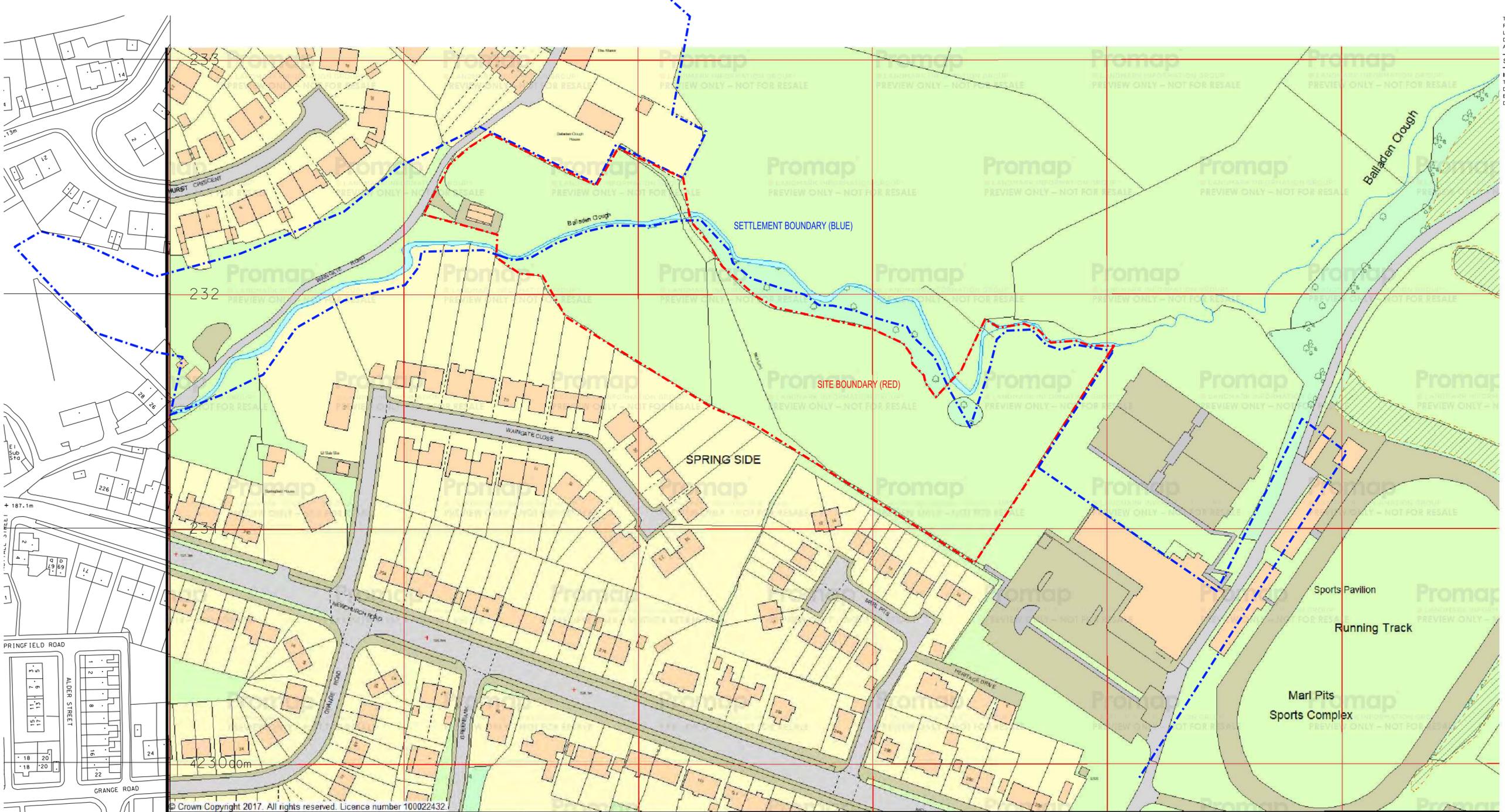
Yours faithfully
for Roman Summer Associates Ltd

Richard Gee
Director

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SITE SPECIFIC HAZARDS

IN ACCORDANCE WITH THE REQUIREMENTS OF THE CDM REGULATIONS 2015 THE FOLLOWING SIGNIFICANT RESIDUAL HAZARDS HAVE NOT BEEN DESIGNED OUT OF THIS PROJECT AND MUST BE TAKEN INTO CONSIDERATION BY CONTRACTORS PLANNING TO UNDERTAKE THE WORKS SHOWN ON THIS DRAWING:



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REV. A 300817 - RSL

REV. DATE NOTES INIT.

CLIENT / PROJECT
IFR LTD
ROSSENDALE,
LAND AT NEWCHURCH RD
 DRAWING TITLE
ROSSENDALE SETTLEMENT BOUNDRY

STATUS FOR INFORMATION

DATE AUG 17 DRAWN RSL SCALE @ A2 1:1250

PROJECT NUMBER	UNIT / BLOCK	CI / SFB CODE	TYPE & NUMBER	REVISION LETTER
10189			04	A

Site Location Plans	L	GA Plans	P	Elevations	E
Sections	S	Details	D	Pictorial Colour	C

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September 8, 2017

RESIDENTS AND FRIENDS OF TOWNSEND FOLD

SUBMISSION TO

ROSSENDALE BOROUGH COUNCIL FORWARD PLANNING DEPARTMENT

UPDATED SEPTEMBER 2017

(Front Cover is a Photograph of ELR train approaching Duckworth Bottom, Townsend Fold

reproduced by kind permission of ELR and the photographer Mr Brian Dobbs)



www.eastlancsrailway.org.uk

September 8, 2017

RESIDENTS AND FRIENDS OF TOWNSEND FOLD

**SUBMISSION TO ROSSENDALE BOROUGH COUNCIL
FORWARD PLANNING DEPARTMENT**

Update September 2017

**RESPONSE TO PROPOSALS TO REMOVE LAND FROM
THE GREEN BELT AT TOWNSEND FOLD AS SET DOWN
AS SITE REFERENCE SHLAA16248 AND SHLAA16249**

FORMERLY

RCGL (GB) 5 AND RCGL (GB) 4

Contact:

David@komunikate.eu.com

September 8, 2017

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11	General Comment
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(ix)	ELR Train Passing through Duckworth Bottom
(x)	ELR Train approaching Townsend Fold Crossing

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1. SHLAA16248 AND SHLAA16249 FORMERLY RCGL(GB)5 –ADDRESS HASLAM FARM, RAWTENSTALL

Introduction

This formal response was first prepared June 2013 in response to the green belt review being undertaken at that time and was submitted to Rossendale Borough Council August 2013. Although the current review has changed some of the original proposals for the green belt situated at either side of Duckworth Lane and goes some way to recognise some of the points raised in the original submission there remains strong support in the area to leave the Green Belt boundaries unchanged. Many of the comments made in the 2013 submission responded to the documents issued at the time however they remain valid where they support the continuation of the Green Belt.

The new proposals which leave the land to the South of Duckworth lane inside the Green Belt represent a significant improvement and are supported by the local residents. In addition the evidence collected by Forward Planning supports the continuation of the Green Belt.

The new proposals for land to the North of Duckworth lane also represent a substantial improvement over the former assessment and recognise the value of the area and its importance as a “stepping stone” site.

During the 2013 consultations proposal emerged which accepted the boundary for continuation of the Green Belt as Duckworth lane as this provided a natural conduit to the Rossendale green areas with green field on both sides and a country lane taking visitors into picturesque countryside providing open views of the Rossendale valley. The residents of Townsend Fold remain of the opinion set down in the report submitted August 2013 that the area is a natural green oasis and enhances the approach into Rossendale seen by road and rail (a view openly supported by East Lancashire Light Railway Co Ltd at the time who have stated:

“We would object most strongly to any development in that area on the basis that it will degrade considerably the visual aspect of what is currently an attractive semi-rural location” (The full comments are reproduced as Appendix “A”).

The area is one of natural beauty and of continuing importance to the development of tourism in Rossendale. Any change of use would damage this key approach into Rossendale and would be an act of environmental vandalism impossible to reverse. It is accepted that there is pressure on local councils to meet housing development targets; however, there are many sites which would provide these opportunities without damaging further Rossendale’s landscape and natural beauty.

The following is a restatement of the report submitted and although four years have passed the comments in support of retaining the green belt remains as valid today as they did when the report was originally compiled.

The residents sincerely hope RBC will appreciate the comments made in the original report which was supported by a petition which eventually exceeded 1000 individuals.

Whilst appreciating forward planning have already amended the original proposals it is understood that the natural beauty of the area is attractive to potential developers and this

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update based on the original review is being submitted to ensure the opinions of the local residents are not overlooked.

We also take note of the Rossendale Green Belt Review 2016 in which Land parcel 25 which includes the land to the South of Duckworth lane was assessed. The conclusion was that:

- **Purpose 1 – To check the unrestricted sprawl of large built up areas.
Rating Strong**
- **Purpose – 2 To prevent neighbouring towns merging into one another
Rating Strong**
- **Purpose 3 – To assist in the safeguarding of the countryside from encroachment
Rating Strong**

The conclusions reach in the Green Belt Review substantially support the opinion of the residents that the Green Belt should be retained and we support the recommendation of the various reports which supports this position.

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THE FOLLOWING SETS DOWN THE COMMENT MADE IN THE ORIGINAL SUBMISSION AUGUST 2013. IN SUPPORT OF RETAINING THE GREEN BELT AND ALTHOUGH PARTIALLY OVERTAKEN BY EVENTS REPRESENT THE STRONG SUPPORT FOR RETENTION OF THE GREEN BELT

GREEN BELT BOUNDARY ASSESSMENT CRITERIA

Rossendale forward planning made a series of observations as part of their green belt assessment criteria. This took the form of a series of questions against which were set the forward planning departments' response.

The responses are considered as incomplete and in some instances do not reflect accurately the position "on the ground".

The following Table sets down the questions included in the forward planning appraisal document and a series of responses which reflects the opinion of residents and visitors to the area:

		Question (From Forward Planning)	Rossendale Forward Planning Advice	The Response of the Residents
1	(a)	Cartographic errors have occurred; or	N/a	The Leader of the Council, Councillor Alyson Barnes has reassured and described to Full Council that the whole "Lives and Landscapes" review being carried out by Rossendale Borough Council as "no more than a tidying up exercise of existing boundaries". As no cartographical errors have occurred and no boundaries are running through peoples back gardens there is no reason Rossendale Borough Council should be proposing the loss of this significant area of green belt.
1	(b)	The current boundary defining the extent of the Green belt is un-identifiable, intermittent and/or indefensible on the ground	N/a	The Green Belt boundary is easily and well defined, complete and highly visible and is totally defensible on the ground in its current form.
2	(a)	It would not significantly reduce the current distances between settlements and built up areas separated by the Green belt; and	The site forms a "green finger" between the railway line and housing on Bury Road. Surrounded on three sides by development	The "green finger" of meadow land forms an important and integral feature to both the green belt and the historic landscape of Townsend Fold. On the east side the site is bounded by both the heritage railway and the Irwell Sculpture Trail, two of Rossendale's

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			it does not separate settlements.	<p>most important tourist assets.</p> <p>On the South Side the site is bounded by the historic setting of the pre 1833 Haslam Farm and the Railway signal Box, and Cottages.</p> <p>On the west site the “green finger” is bounded by the historic Townsend Fold buildings of Hare and Hounds (Now the Whitcuff) and the 1867 Methodist Chapel.</p> <p>In the centre of the meadow land is the historic and picturesque Duckworth Hall and Duckworth Lane.</p>
		Question From Forward planning	Rossendale F.P Advice	The Response of Residents
				Rossendale Borough Council’s proposals would lead to the development of this meadow land in filling with housing leaving little open area and destroying the settings of these historic settlements.
2	(b)	The site perimeter is directly adjacent to the Urban Boundary; and	Yes	The land is adjacent to the existing urban boundary as it is the commencement of the green belt in this area of Rossendale. The whole point of the green belt is to place a brake on urban sprawl and to protect green areas for the benefit of residents and visitors to the area.
2	(c)	It would not hinder urban regeneration of derelict, vacant and /or previously developed land in adjacent or neighbouring settlements.	Could have a minor impact but would depend on the attractiveness of the alternative sites that are available.	<p>Rossendale Borough Council have themselves recently produced a list of over thirty brown field sites in Rossendale that currently are waiting for development. This list itself is not exclusive and we are of the opinion that a more in depth study will reveal a significant larger amount of brown field and previously developed sites within Rossendale waiting for, and suitable for development.</p> <p>Releasing this picturesque land from the green belt would not only reduce pressures to develop these visually negative brown field sites on a land area</p>

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				for land basis but would also considerably deteriorate the setting of the Heritage Railway and approach into Rawtenstall and Rossendale and thus compromise the future influence of the Heritage Railway and tourism to help regenerate the whole of Rossendale including the above referred to brown field sites.
		Questions From Forward Planning	Rossendale F.P Advice	The response of the Residents
2	(d)	It would not adversely impact upon local and longer distance views or detrimentally affect the openness of the Green Belt; and	It would have some impact on views of local residents and from the ELR -it would be visible from longer distances but would appear within a broader urban context	<p>The development would have a major impact on the views and devastate environment experienced by local residents.</p> <p>Passengers and tourists using the ELR would see a major change to the landscape on the approach into Rossendale, destroying the picturesque views from the steam trains The ELR clearly recognised the tourist value of the area by choosing to feature it in their publications. Further on the ELR main website the area has been specifically identified for railway photographers as key photo opportunity area.</p> <p>Walkers and tourists on the Irwell Sculpture Trail would also suffer a dramatic loss of pictures views similar to those of the Heritage Railway.</p> <p>The area is highly visible from the A56 North to Helmshore and Rawtenstall and from the opposite side of the valley and would have a negative impact on the green views currently experienced.</p> <p>What is currently an attractive part of the countryside would be lost forever to urban sprawl.</p>

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2	(e)	It does not make a significant contribution to the beneficial use of the Green Belt.	Because of the degree of enclosure makes little impact	The statement that loss of this green belt would have little impact demonstrates a lack of understanding as it is clear to those who use the area that it is an important section of the green belt. There appears to be a failure to realise the importance of the green belt to the area and Rossendale. The meadow land makes a significant contribution to the green belt. Development of this land will substantially reduce enjoyment of the countryside for residents and visitors who enjoy immediate access to this part of the Green belt via Duckworth Lane.
		Questions From Forward Planning	Rossendale F.P Advice	The response of the residents
				The approach into the valley along the heritage railway and Irwell Sculpture Trail will be permanently blighted, damaging further the potential for developing the tourist industry within Rossendale. Picturesque Duckworth Lane runs through the middle of the proposed loss of Green Belt. This is a popular lane used by residents, walkers and railway photographers Duckworth Lane's position running through the green belt, allows walkers and residents to interact with and experience the benefits of the green belt.
3	(a)	Normal planning policies would not be adequate to maintain the permanence and openness of the existing green belt; or	Site would be removed from Green Belt	We fail to understand the meaning behind this question or the response. Normal planning policies would be adequate to maintain the permanence and openness of the green belt.
3	(b)	Site specific circumstances have significantly changed since the boundaries were defined; and in all cases	Core Strategy defines Rawtenstall as the location for 30% of new development.	It is the opinion of residents and supported by various signs that Townsend Fold is a village in its own right and as such has an identity separate to Rawtenstall.

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				<p>There have been no site specific changes to the area since the area was originally designated as green belt.</p> <p>It is our understanding that the “Core Strategy” from which the 30% of new development is quoted is based on a document for development which is no longer current.</p> <p>The core strategy for development relates to the provision of homes to meet (withdrawn) government targets. Homes mean dwellings of all types including existing conversion of existing buildings into apartments etc. There are a number of sites which could provide the planners with the solution to</p>
		Question From Forward Planning	Rossendale F.P. Advice	The response of the Residents
				meeting any national targets without invading Rossendale’s Green Belt.
3	(c)	It would maintain or increase the current distance between settlements and built up areas separated by Green Belt; and	Would reduce distance within urban area but not between urban areas.	<p>It is our belief that the advice is incorrect in that although the map included as part of RCGL(GB)5 implies there would not be a reduction of distance between urban areas, this would not be the appearance “on the ground” following development.</p> <p>For any observers the infill arising from development would give the impression of a reduction in distance between the settlements of Townsend Fold and Edenfield.</p> <p>This threat to the distances between settlements is further increased by the proposal to remove two sections of the green belt at the Northern end of Edenfield.</p> <p>Forward planning proposal for loss of green belt at Townsend Fold has</p>

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				resulted in submissions from a developer seeking to increase the amount of land to be considered in the proposed boundary changes which (if considered) would mean a reduction of distance between urban areas.
3	(d)	It would assist the urban regeneration of derelict, vacant and /or previously-developed land in adjacent or neighbouring settlements; and	Impact likely to be relatively minor but depends on the attractiveness of alternative sites.	It is our contention that any development of the nature under consideration will have an adverse impact on the neighbourhood by increasing congestion on Bury Road and the A56, creating major safety and parking problems on Bury Road during periods of snow and ice (see photographs illustrating the problems in the area caused by adverse weather
		Questions from Forward Planning	Rossendale F.P. Advice	The Response of the Residents
				conditions) and adding to local infrastructure problems.
3	(e)	It would protect or enhance local and longer distance views and the openness of the Green Belt; and	There would be a local effect but not significant at larger scale.	Forward planning state that there would be a “local” effect but not significant at larger scale. This statement could apply to any part of the countryside! Any change will impact the immediate area and will have a major visual impact on longer distance views and the openness of the Green Belt. The area under threat is clearly visible as part of the main gateway approach into Rawtenstall both by road and rail.
3	(f)	It would make a significant contribution to the beneficial use of the Green belt.	Little impact at present	The view of the Forward planners is that there is “little impact” at present. This statement is at odds with the reality on the ground. The Townsend Fold Green Belt is widely used by both residents and visitors to the area more frequently than most parts of the Green Belt as there is easy access to open countryside via Duckworth Lane. The area is used by local walkers, tourists, ELR train spotters and photographers and ramblers. It is an area of particular value to Rawtenstall and Rossendale as a whole. It is a highly visible part of the approach into

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				Rossendale and, is clearly an integral part of the existing green Belt. The area is one of natural beauty as can be seen from the photographs of the area included in this submission.
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GENERAL COMMENT

The” Appraisal”.

“Site has no special ecological status or wider constraints. It reads as part of the urban area and has no special value as part of the Green Belt. While it is Greenfield land it would contribute to the housing supply in Rawtenstall which is a Core Strategy priority”

The “Response”

The area is rich in ecological habitat, with buttercup meadows and bluebell woodland. It is home to numerous wildlife including butterflies, insects, bats, badgers deer and owls.

It is part of the green belt not the urban area and provides a hugely important and historical green setting to the village of Townsend Fold, the heritage railway and the Irwell Sculpture Trail.

Rossendale is not without land suitable for development it has many Brown field sites, and in addition, there are substantial areas of land graded as countryside. It is our understanding that development should first use existing Brown Sites, then Countryside and finally (supposedly as a very last resort when other sources are exhausted and there is an overwhelming need) consideration may be given to use of the green belt.

It is clear that Rossendale has not reached saturation levels where it is necessary to reclassify green belt land.

RCGL (GB) 4 –BEHIND K STEELS

September 8, 2017

The Forward planning proposal is to take some land from the Green Belt and bring it into the Urban Boundary, to enable it to be developed in the future. **It is claimed** that the present boundary is very difficult to read on the ground and that the proposal would represent a more logical and defensible boundary.

The Green Belt Boundary assessment Criteria raises the same questions already set out in RCGL (GB) 5 and the responses to the questions in RGL (GB) 5 can therefore be considered as equally applicable to RCGL (GB) 4.

The area included in RCGL (GB) 4 is divided from the proposed changes set down in RCGL (GB) 5 by the East Lancashire Rail line. Apart from this it is a contiguous part of the Green area accessed via Duckworth Lane. The ELR Timetable front cover for 2013 illustrates the continuous nature of the Green area as the photograph shows both sides of the area under threat.

The Summary of the Green Belt Assessment statement prepared by Forward Planning makes the claim that the present boundary is very difficult to read on the ground and is confusing. This statement is refuted as access to the area via the level crossing at the bottom of Duckworth lane is clearly visible with footpaths well marked providing open access to the wooded area, grassland and the Irwell River pathway. There has not been any evidence of the delineation of the boundary creating any confusion other than the statement made by the Forward Planning department.

Additional Comment- Response to Potential Developers Proposals

General Statement

Our detailed response and opposition to the Forward Planning proposals to release land set down on RCGL (GB) 5 and RCGL (GB) 4 apply equally to any proposals made by developers to build on these Green Belt areas.

Area proposed by forward planning to excluded from Green Belt under RCGL (GB) 5

It is understood that the land area set down in RCGL (GB) 5 represents approximately 1.6 ha (3.95 acres) and is considered by Forward Planning as potentially suitable for development of up to 72 dwellings.

Additional Area proposed by Turley Associates to be excluded from the Green Belt

Turley Associates, acting on behalf of Peel Holdings (Land and Property) Limited made a submission to Forward Planning by Email on the 28th November 2012. In this submission reference is made to additional land to the south of the proposed Green Belt release that they state they believe should also be taken out of the Green Belt. The additional area of 1.9 ha (4.7 acres) is shown on the development plan submitted by Turley Associates under their reference PEEM2067 and is part of their development framework document submitted on the 28th November 2012.

Turley Associates claim that the combined site represents a “logical” rounding off of this part of the urban area of Rawtenstall.

The claim made by Turley Associates is difficult to reconcile (for all the detailed reasons set out in this response document) and is considered totally inappropriate by local residents.

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The proposed extension of Green Belt release takes a large piece of additional land which parallels the ELR and extends the exiting urban boundary.

The Green Belt Boundary Assessment Criteria item number 3 (c) prepared by Forward Planning states that the Forward Planning proposal would “**reduce distance within urban area but not between urban area**”.

The proposals made in the Turley associates submission is a clear breach of Forward Planning proposals and, if adopted, would impact the existing urban boundary by reducing the distance between the urban areas.

The removal of any of the land situated In the Haslam Farm or K Steel area from the Green Belt is considered to be unnecessary to support the Core strategy and the request by Turley Associates that an extra piece of land is included for removal from the Green Belt is considered unacceptable for the following reasons:.

1. Simply because an area has been chosen for review and forms part of a Core strategy proposal does not mean that there should be an automatic presumption that housing development will go ahead or the land will be removed from the Green Belt. The consultation process, if it is to have any validity, must take into account opposing points of view and in particular those of the people of Rossendale and especially those of local residents most affected by any changes.
2. The site is an area of green land which would no doubt be of prime interest to any developer as it is an area of natural beauty and therefore a particularly attractive proposition to a housing developer. However, this does not make the area an appropriate location to achieve an early boost to housing supply as by doing so it removes permanently an area of Green Belt which is of particular importance to the locality and prevents the very urban sprawl for which the Green belts were first established.
3. The site is approximately one mile from Rawtenstall town centre and local schools are within reach however their ability to cope with a substantial influx of pupils is questionable. The proposal by Turley Associates to build 155 dwellings in the enlarged area will severely test the road infrastructure especially at peak times. In addition, weather conditions during the winter months necessitate parking of cars (by local Residents) on Bury Road. (See photo gallery). There is a shortage of suitable space for this purpose and an increase in population to the area would simply exacerbate the problem. For these reasons the area is not as well related as is being suggested.
4. It is claimed the enlarged site shares many of the characteristics of RCGL (GB) 5. It may do so in that it is part of a contiguous area of Green Belt land. This land is the first (or last) defence of the urban boundary which prevents the encroachment of urban sprawl into the remaining Green areas bringing with it the environmental damage referred to in this document.
5. Turley Associates make the point that the SHLAA concluded that site RCGL (GB) 5 is “**within a wider area of good desirability and within an immediate area of excellent desirability**”.

This statement absolutely supports the view of the community that the area is of particular importance in maintaining the integrity of Rossendale urban boundary and ensuring it remains of benefit to current and future visitors and residents of Rossendale.

September 8, 2017

It seems clear from points made by Turley Associates that the economic value of the site is considered as the primary reasons for changing its status. It is hoped that Forward Planning and the Local Council will accept that an important decision relating to the maintenance of the Green Belt will not be made primarily on the basis of the economic argument presented by potential developers.

6. It is claimed:

- **The area is not in a sensitive landscape** – this statement is contested on the grounds that the area is visited regularly by many groups who enjoy the proximity and access to the local natural landscape
- It is clear that a change of status from Green Belt to Urban Development land would lead to development similar to that proposed by Turley Associates which would have a major impact on the landscape and the visual character of the area.
- The local area contains many habitats including woodland, grassland and has its own ecological system with an abundance of bird life. The adjacent woodlands provide sanctuary to a range of animals including small deer which would be adversely affected by development.
- The development would place a severe strain on local road infrastructure.

7. The existing landscape represents an area of natural beauty and does not need enhancement by development and landscaping and is best left unchanged as a barrier against urban encroachment on limited green space.

8. Turley Associates have also stated that:

- The site does not perform a strategic Green Belt function: this point is strongly disputed for the reasons stated in this document.
- They claim the development would not result in encroachment into the wider countryside- it is clear that the development will remove Green Belt land from the countryside so is clearly an encroachment into the wider countryside.
- They claim it would not result in urban sprawl or lead to the merger of separate settlements- The proposed development is an example of urban sprawl and with the addition of the area shown in Turley associates plan reference PEEM2067 reduces the gap between settlements.
- They claim that the proposals would create a logical defensible long term green Belt boundary- The existing boundary has been perfectly defensible since its inception and there is no logical argument to suggest this would not be the case in the future. To claim that a development (as proposed) and change of use as is being proposed by forward planning would improve the defensibility of the boundary is not credible.

Conclusion

September 8, 2017

The Development framework document pack submitted by Turley Associates is an attempt to provide justification for a substantial housing development on land designated as Green Belt. The arguments put forward are fundamentally for the benefit of the developer and do not take into account current use and the views of visitors and residents to the area or the visual impact upon a major gateway into Rossendale.

Petition (Appendix "B")

Included in support of our response to the proposals is a copy of a petition signed by more than 800 individuals who are strongly opposed to any changes to the green belt at Townsend Fold. (Full details will be made available to Rossendale Borough Council)

General Summary

This document has been prepared for submission to Rossendale Forward Planning department in response to the proposed change to the Green Belt at the Haslam Farm and K-Steel area of Townsend Fold. It sets down the objections to the proposals based upon a survey of the views of the residents and visitors to the area.

The Residents and Friends of Townsend Fold Association are submitting these objections on behalf of the local community and all those parties who have shown support to the objectives of the association to protect Townsend Fold Green spaces.

Appendix "A"

Received by: greenbelt@townsend-fold.org.uk email dated 22nd May 2013

Subject: Objection to revision to Green Belt

Sirs

Would you please accept this email as the East Lancashire Railway's formal position regarding Rossendale Borough Council's proposals to revise the green belt boundaries in the Townsend Fold area.

We would object most strongly to any development in that area on the basis that it will degrade considerably the visual aspect of what is currently an attractive semi-rural location and one that provides a pleasant outlook for our visitors and customers. Indeed, the location provides an important backdrop for our prestigious evening dining train service which pauses in the vicinity to allow the service of the main meal during the journey to Rawtenstall.

The railway has previously suffered a degradation of the visual aspect in the area when the properties adjacent to the line in Holmeswood Park were built a few years ago and we would object most vigorously to any similar proposals that would result in a further worsening of the overall product offering for the ELR. Considering that the local authority is a key stakeholder in the railway and are pressing to improve the visitor experience in regard to the area and Rawtenstall in particular we would dare to suggest that the two issues are very much in conflict.

September 8, 2017

We wish you every success with the petition and are more than happy to help further with these objections, wherever we can be of assistance.

Kind regards

Andy Morris
General Manager
East Lancashire Light Railway Co Ltd

Mobile no.
Office tel. 0161 763 4340



The North West's Premier

Heritage Railway

Appendix "B" PETITION PROTECT ROSSENDALE GREEN BELT



September 8, 2017

I am signing this in support of the campaign to prevent changes to Townsend Fold green belt.

I confirm I do not think the changes proposed by Rossendale forward planning are acceptable and I do not believe there should be any change to the present boundaries.

Signature: _____

Please print: _____

Address: (including post code) _____

Photo Gallery

- (i) **Bury Road January 2013 –Residents Parking!**



September 8, 2017

(ii) ELR at Duckworth Bottom

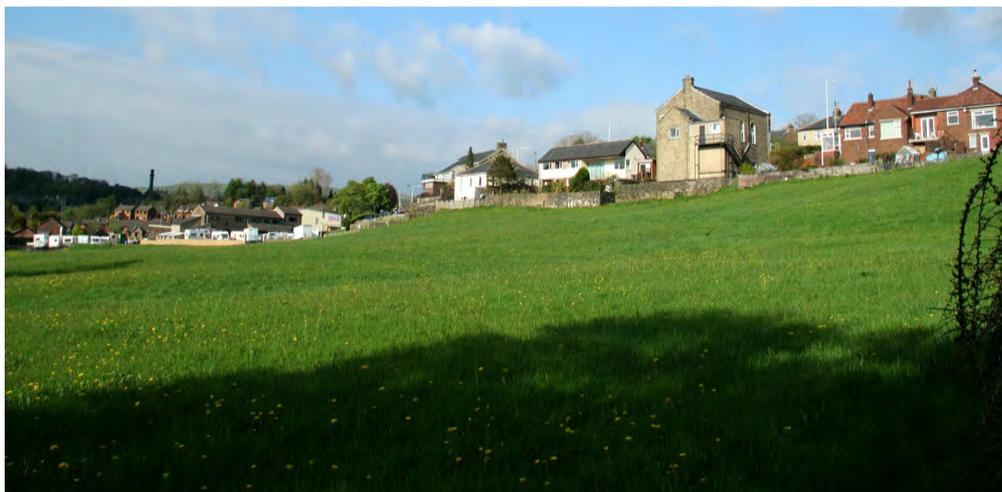


(iii) Approaching Duckworth Bottom Looking North



September 8, 2017

(iv) Duckworth Lane looking towards The Chapel, Witchchaff, and Haslam Farm



(v) View from the top of Duckworth Lane looking downwards across field South of Haslam farm

September 8, 2017



(vi) The Irwell, ELR and Land behind K Steels and looking towards Duckworth Bottom



(vii) Looking South from Duckworth Lane

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(viii) Bottom of Duckworth Lane (ELR Dining Train Stop!)

September 8, 2017



(ix) ELR Train passing through Duckworth Bottom



(x) Train approaching Townsend Fold Crossing

September 8, 2017



16-09-17.

Dear Sir/Madam,

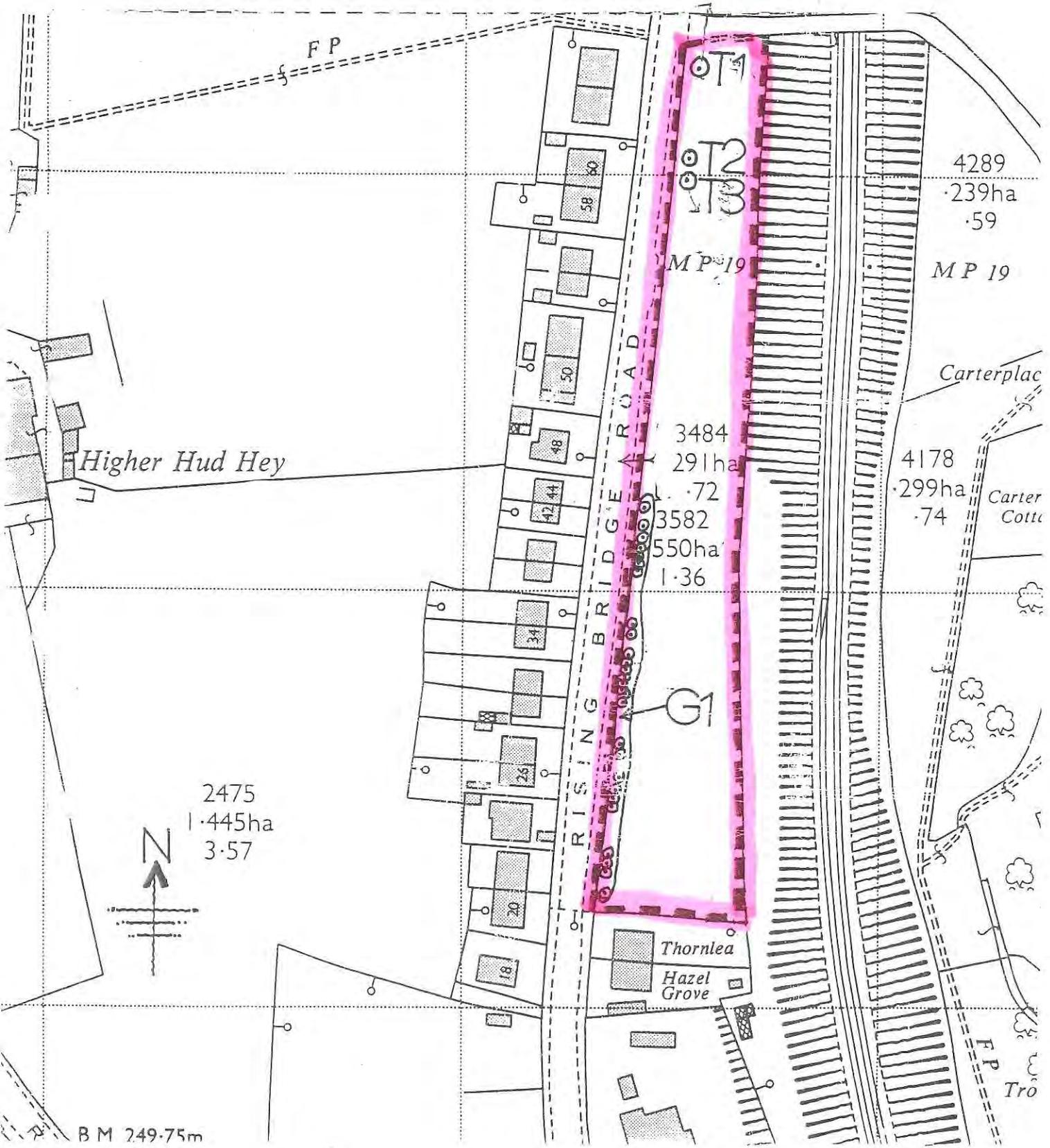
Re the Plans
for the future housing
development for Rossendale
Borough Council. I enclose
"2" Two Plans of land
that has been requested
by three developers for
future development -
1) land at Rising Bridge Rd,
suggested for 24/26 no
bed Peoples, one bedroom
Bungalows. ?
2) land for Housing/Industrial
development. Please look
to the inclusion of these
land for the future,
development. Thanking you
your sincerely
Jala Barnes

SHLNA 16343 BOROUGH OF ROSSENDALE

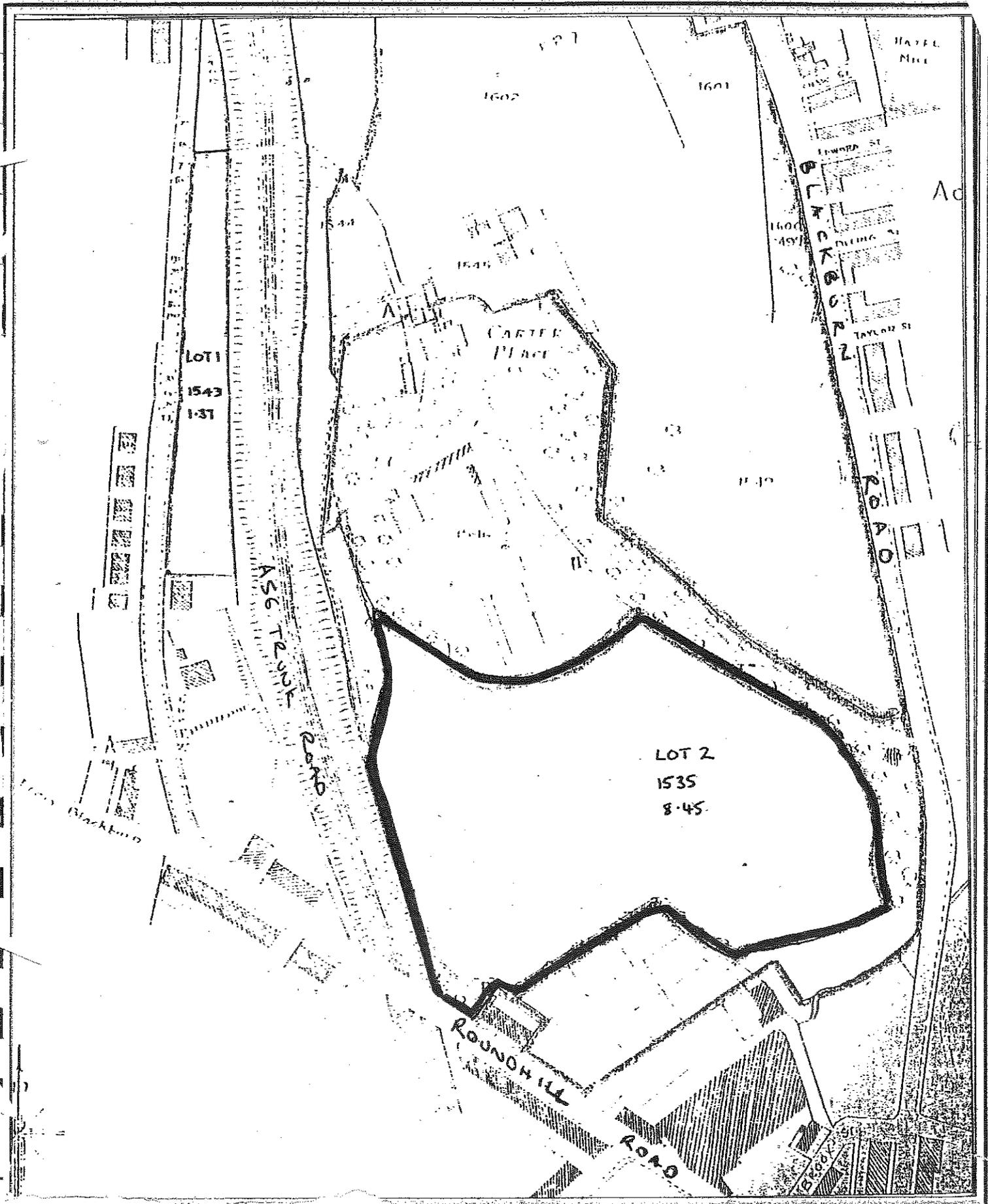
Land at Rising Bridge Rd. Haslingden.

site not allocated

Scale 1:1250 T2/76



2042, 15



BN HAND

Received 26/01/17 Added to database

572

FOR THE ATTENTION OF FORWARD PLANNING

Pctition

Rossendale Borough Council- Local Plan Review- September 2017

Site HS2.76

Site Reference: SHLAA16384
Land at Snig Hole , Helmshore
Developable area: 0.25Ha (0.62Acre)
Development Yield: 7 Houses

Sir,

I wish to make the following comments which relate to the above site referred to in the current Local Plan Review.

Context

This village of Helmshore has undergone many changes in the last 30/40 years. There have been many houses built, principally on large estates on Green Field sites but outside the Green Belt. There has also been selective infilling on Brown Field sites.

The local authority has been mindful in the past of the value of the Green Belt which was created to protect the unrestricted sprawl of large built-up areas, to assist in safeguarding the countryside from encroachment, to preserve the setting and special character of (historic) towns and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

In particular the tract of land known as Snig Hole Park/Holme Vale is located at the north west tip of a large section of land which comprises the Green Belt P30,31 and 42. For the residents of Helmshore it is the start of a much appreciated, unique valley which wends its way down to the hamlet of Irwell Vale. This is considered not only an asset for the village but also a place for recreation for people who live outside the immediate area.

The sides of the valley (or vale) are formed initially by fields (including the land HS2.76) to the immediate north east together with the former railway cutting and the river, allotment gardens, B6214 and more fields bounding the south west side.

Environmentally the park is framed and protected by the adjacent land, there being very little of the surrounding existing development evident due to the topography and landscaping. This is an important and valuable asset.

Visually the adjoining fields are seen as very much part of the pastoral scene which is experienced the moment a visitor walks through the park gates.

The park which was originally land donated to the inhabitants of Helmshore by the Porritt family, together with its setting forms a distinct, identifiable whole which has been left intact for many years.

Please refer to Google Earth screen shot Docs.1A and 1B where the integrity of the park and its setting can be readily appreciated.

It can also be seen how the annexation of site HS2.76 which is surrounded on 3 sides by Green Belt, could be termed piecemeal development, thus initiating the erosion of the Green Belt which at present has a clearly defined, regular boundary. If this land is given over to housing there is very little reason why other neighbouring land would not eventually suffer the same fate. In this location it could be the 'thin end of the wedge'.

The residents of Helmshore must decide whether the council is acting in the best interests of the people. If they believe that the officers have not made a rational decision in promoting site HS2.76 for housing they must lobby for it to remain in the Green Belt.

Please refer also to photos numbered Docs.2-11 inclusive which illustrate the important part that this plot plays in the general character of the area and street scene.

Over the space of only **2 hours** on Sunday morning, 17th September 2017 I collected a sample of 52no. signatures from walkers and passers-by. See Doc.12.

Very few people refused to sign the petition and it was noteworthy that the people who did decline gave reasons such as 'it won't do any good, they (RBC) will do what they want to do' and 'I haven't heard anything about it'. Many people who signed the petition gave the reason that 'there were already too many houses in Helmshore' and 'it will be just more houses without the necessary infrastructure'.

The above comments not only indicate how little local people knew about the draft Local Plan proposals but also how passionately they felt about more land being allocated to new housing and in particular with regard to site HS2.76, the senseless erosion of the Green Belt in this location.

In recent years, due to the persistence and voluntary action of local residents spread over several years, Snig Hole Park has undergone a transformation. The childrens' play area has been renewed, the football pitch drained and levelled and turfed, a riverside path complete with sculptures created and trees planted.

Very little, if any, local authority money was used in this very expensive recreational project.

Work carried out by Lancashire County Council in Spring/Summer this year on resurfacing and draining the single track lane down to Snig Hole (Holme Vale), which is not constructed to County Highway Standards, has completed this section of Cycleway B6.

It is well known that Rossendale Borough Council is very vigilant and unsympathetic towards illegal development, unapproved alterations to listed buildings etc so it seems very inconsistent that they are able to consider the piecemeal annexation of a very critical part of the Green Belt in this particular location. A site which could be considered part of the entrance to very important recreational area which extends all the way down the Irwell Valley to Bury.

I submit that there are probably still more Brown Field sites which have not been considered in other parts of the borough where redevelopment should take place as a priority not only to ensure economic regeneration but also to provide a decent environment, fit for the people who already live there.

In their site checks for the Local Plan Review RBC indicate whether the owners of the land are prepared to develop their plots and a time scale is indicated. It does not come as a surprise that owners of land in Green Belt welcome the change of use to Housing Land as the value of their land will increase beyond their wildest dreams. Their willingness to develop land in their ownership only indicates their insensitivity to the needs of their neighbours and the local community and their greed for the acquisition of personal wealth.

I submit that the fact that an owner is willing to develop land in Green Belt should not influence its land use status, the release of this land for development or affirm/ give credibility to its suitability.

RBC have expressed their desire to identify 'sustainable sites' for new housing development.

I submit that annexing Green Belt land is neither desirable nor a sustainable use of land which should remain open for future generations and be considered a permanent, valuable asset for all time.

We will not have a second chance.

Site HS2.76

The site is bounded on the north western boundary by Helmshore Road (B6214), a single track lane leading to Snig Hole (Holme Vale) down the south western side, a public footpath to the south east, the top part of a private drive to Tor View Barn, Tor View Farm/Cottage and their access on the north eastern side and the Helmshore Bowling Green at the junction with Helmshore Road.

The land is used for the general grazing of animals – a perfectly adequate use for good pasture. There is a small garden enclosure along part of the north eastern boundary.

The land has bad vehicular access due to sight line restrictions uphill at the access to Tor View Farm/Cottage. The sight lines are severely compromised by the retaining wall for the bowling club/green on the northern corner of the site. Traffic proceeds both up and down the hill at a pace. There are always residents' cars parked on the uphill side of the carriageway which further restrict the road width at this point.

The junction of Station Road/Helmshore Road is nearby which is also opposite the park entrance.

Any access via the lane to Snig Hole is inappropriate as this is single track with no passing places. The lane surface was formerly unmetalled and has only a thin asphalt finish with no subgrade construction. The asphalt has been relayed this year by LCC as part of Cycleway B6.

In any case the lane is in public ownership, reserved for the use of pedestrians, horse riders and the residences that it serves. It is outside the jurisdiction of the owner(s) of site HS2.76.

The lane is regularly used by walkers, horse riders and the residents of Holme Vale and Tor View barn.

There are large services present under the lane, notably a 14" (?) water distributor main, a gas distributor main and other unknown services.

The lane is within the curtilage of the Memorial Park and public recreational area now under the jurisdiction of Rossendale Borough Council.

You will recall that this land was given to the residents of Helmshore for their enjoyment in perpetuity by the Porritt family. Whilst there are probably no covenants known regarding the lane's use, I doubt that the Porritts donated the land for the financial benefit (profit) of others.

We, the residents of Holme Vale have striven to retain the stone park gate posts during the recent work on the lane. We have ensured that all 3 gateposts were retained, despite rumours that one was to be permanently removed. We lobbied RBC to ensure that at least a modicum of the stone sets were reinstated across the crossing, maintaining that these were 'part and parcel' of the original architectural character of park entrance. We think that we have achieved this without any support from RBC. We do not want the open, rural character of the lane to be destroyed, nor do we wish the historic park gateposts and new setted crossing to be removed.

The ground level within site HS2.76 is high in relation to Helmshore Road. Any development within the site will be consequently at a high level and will compromise the prospect of the cottages along the north west side of the road. The prospect of Tor View farm/cottage/barn will also be affected.

It must be born in mind however that the land under consideration is in the ownership of some of those who live in this existing settlement. It is anticipated that there will be little objection to any change in the status of site HS2.76 or a proposed housing development as there clearly exists a bias towards the use of the land.

Tor View cottages are well set along the crown of the sloping field. Whilst the field cannot be termed 'steeply sloping', it is by *no means* level.

The land is frequently water-logged in the winter months and a suspected ground water spring issues onto the lane on the left hand side of the gated opening to the drive up to Tor View barn.

The plot of land at the southern tip of HS2.76 is isolated by the drive up to Tor View barn. I believe that it is in a different ownership to the main field under consideration although this does not appear to be clear in the review. This portion has been used for poultry and latterly the grazing of ponies. The reason that it appears redundant is because the owner chooses to leave it like that. The construction of a ménage has effectively cut this original parcel of land in two. The drive is a private drive being surfaced in mass concrete. It is not suitable for access to more than 1 no. dwelling.

When planning permission was granted for the barn I believe that RBC insisted that a separate, independent vehicular access be created in order not to increase the traffic onto Helmshore Road at the northern point of the site.

How is it now possible that RBC can promote the development of site HS2.76 for 7 houses with identical access restrictions?

I submit that upon consideration of the above facts site HS2.76 should not be taken out of the Green Belt nor is it suitable for sustainable housing development.

People who elect to live in the Green Belt do so because they value the protection that planning legislation provides. They appreciate that successive governments have attached great importance to Green Belts and that local authorities have a duty to plan positively to enhance the beneficial use of the Green Belt. They are also encouraged to provide opportunities to provide access, outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity.

I submit that to allow the construction of new houses on this virgin site will achieve none of those things and furthermore it will undermine the very reasons why people choose to live within or adjacent to the Green Belt in this particular instance.

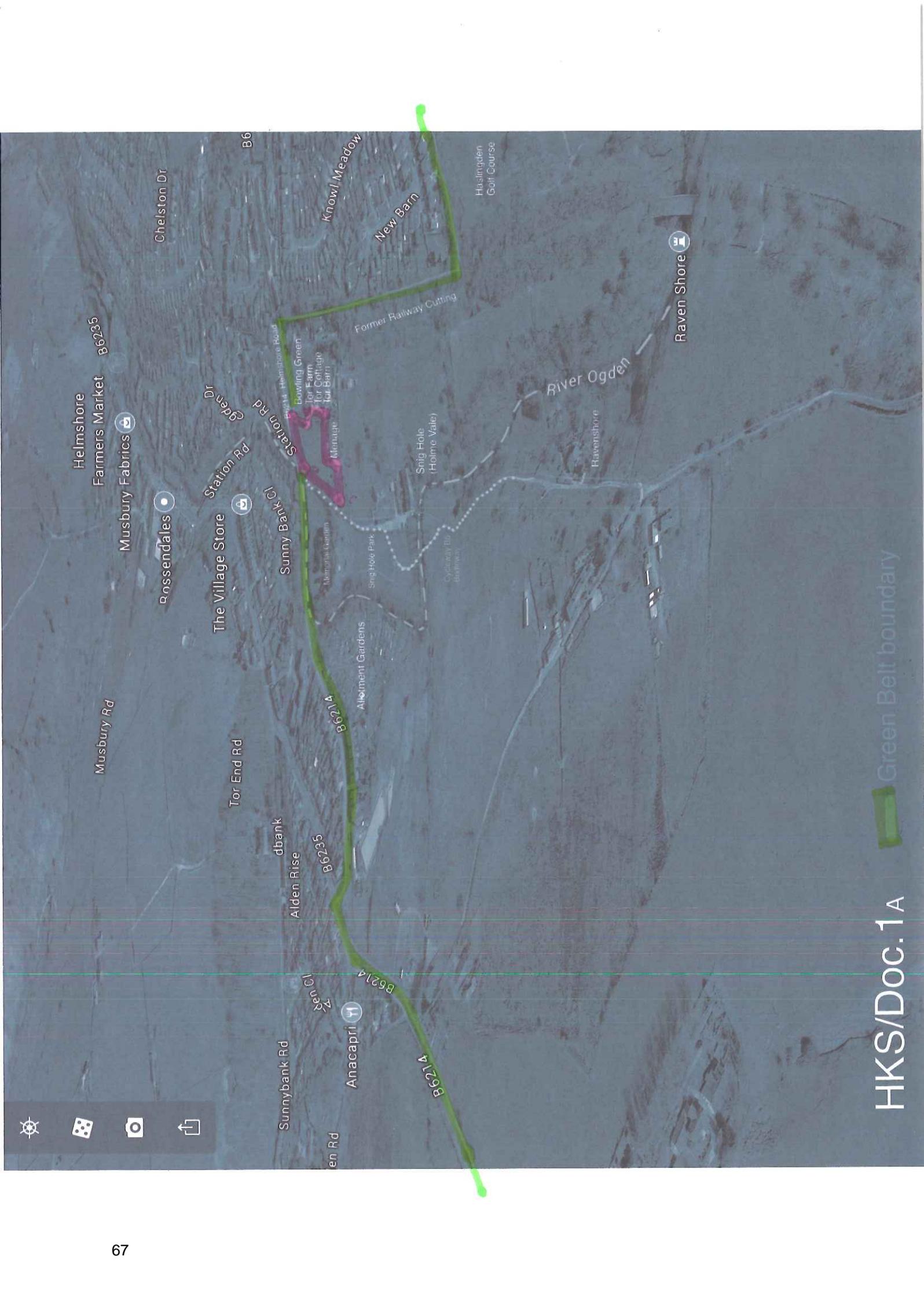
I understand that current government policy is changing in the next year and the new housing provision required of Rossendale may be reduced thus providing an even stronger argument for this small site not to lose its Green Belt status.

I would be grateful if you would give the above comments serious consideration when considering the realignment of the Green Belt boundary.

Yours faithfully,

Keith Smith
Holme Vale,
Helmshore
BB4 4AF

20th September 2017





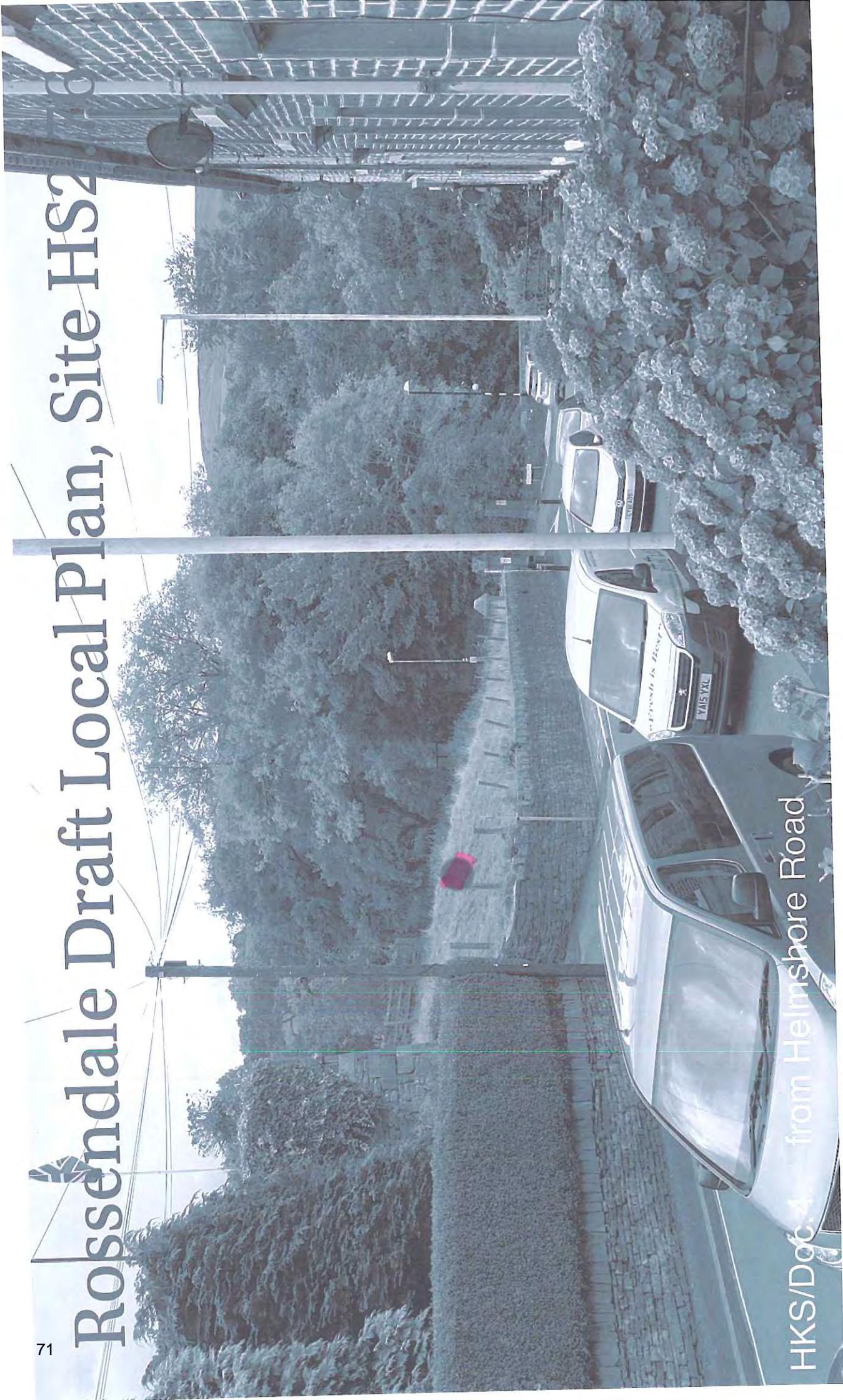
Rosendale Draft Local Plan, Site HS2.76



HKS/Doc.3

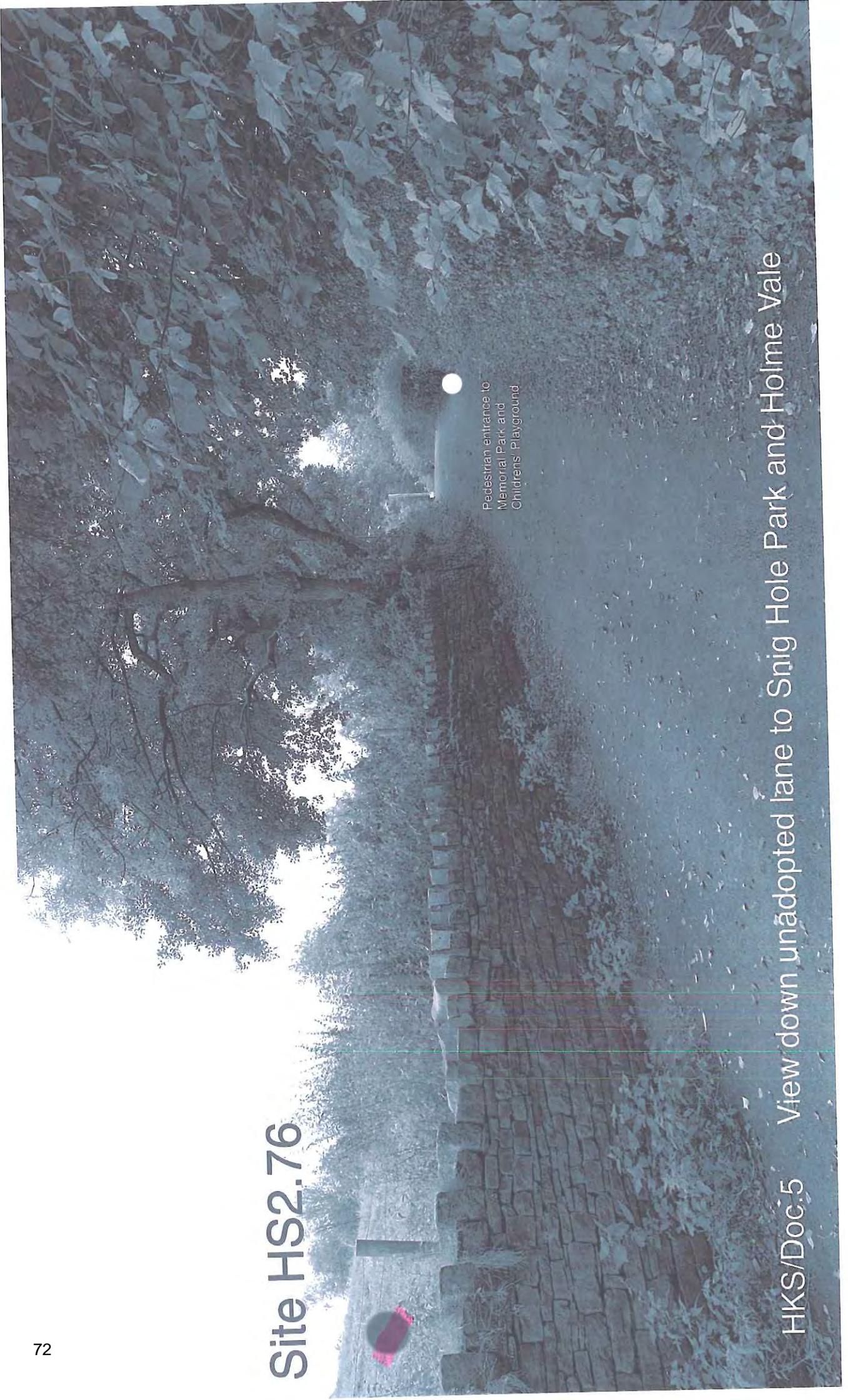
From Helmshore Road

Rosendale Draft Local Plan, Site HS2.78



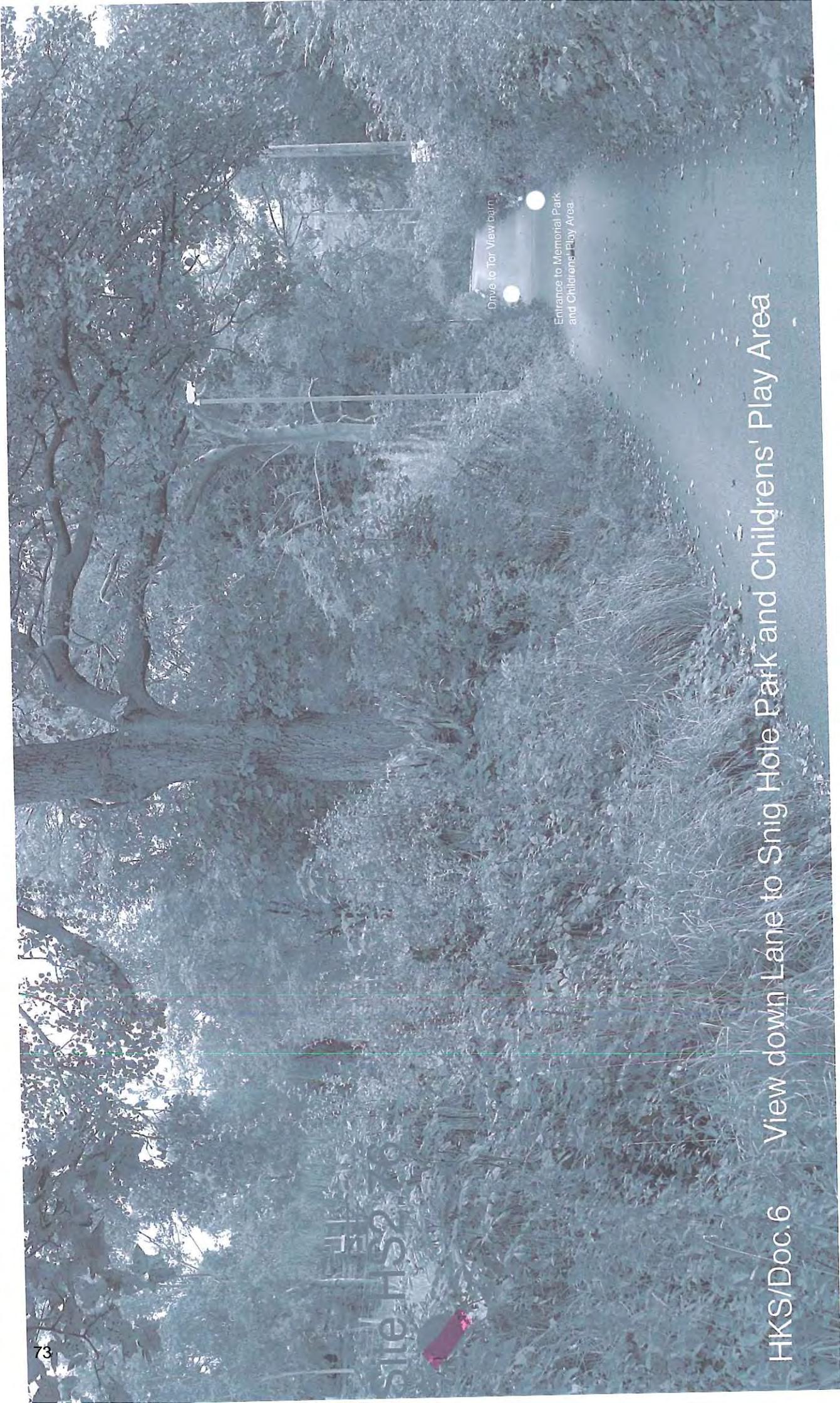
HKS/Doc.4 from Helmsshore Road

Site HS2.76



Pedestrian entrance to
Memorial Park and
Childrens' Playground

HKS/Doc:5 View down unadopted lane to Snig Hole Park and Holme Vale



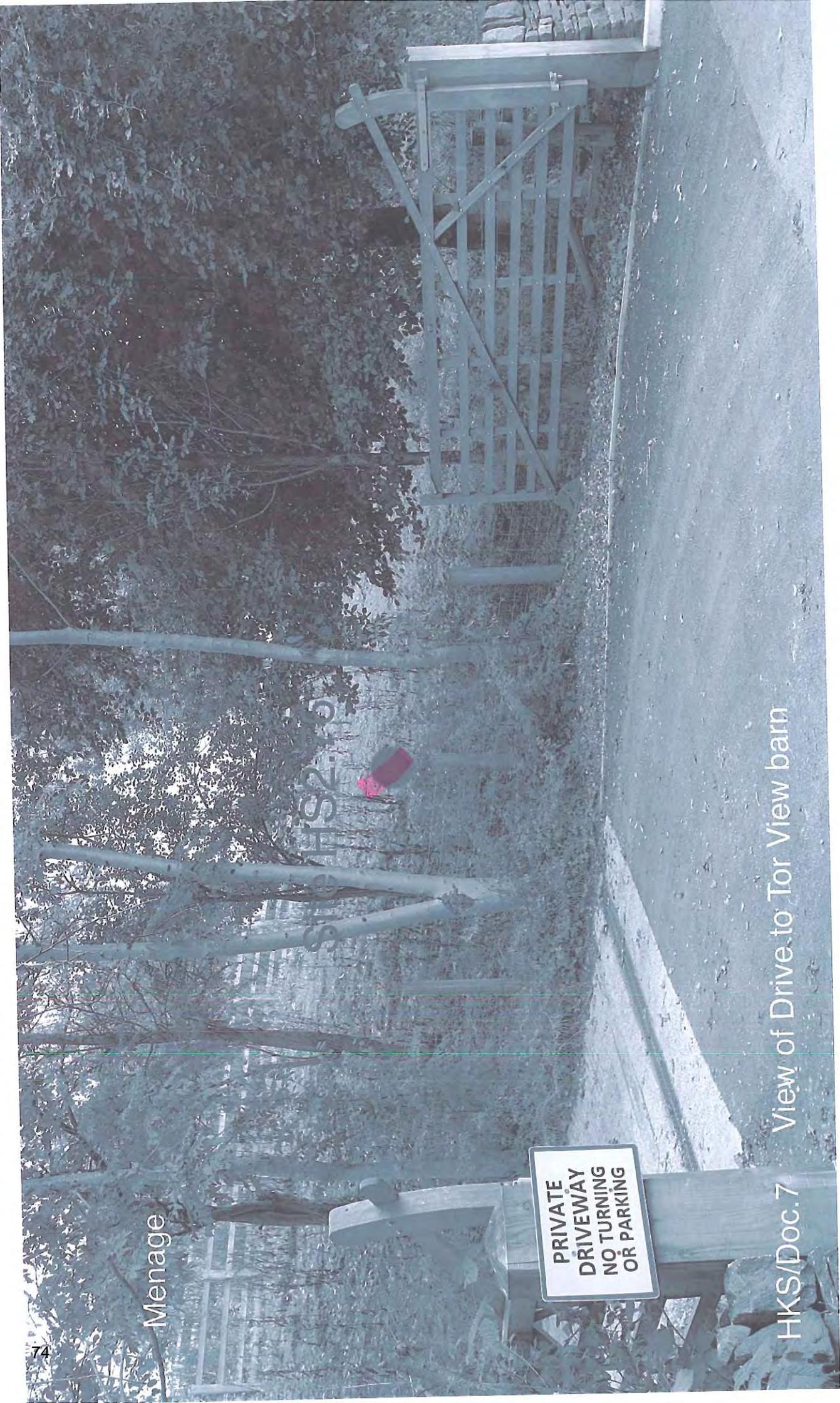
HKS/Doc.6 View down Lane to Snig Hole Park and Childrens' Play Area

Menage

PRIVATE
DRIVEWAY
NO TURNING
OR PARKING

HKS/Doc.7

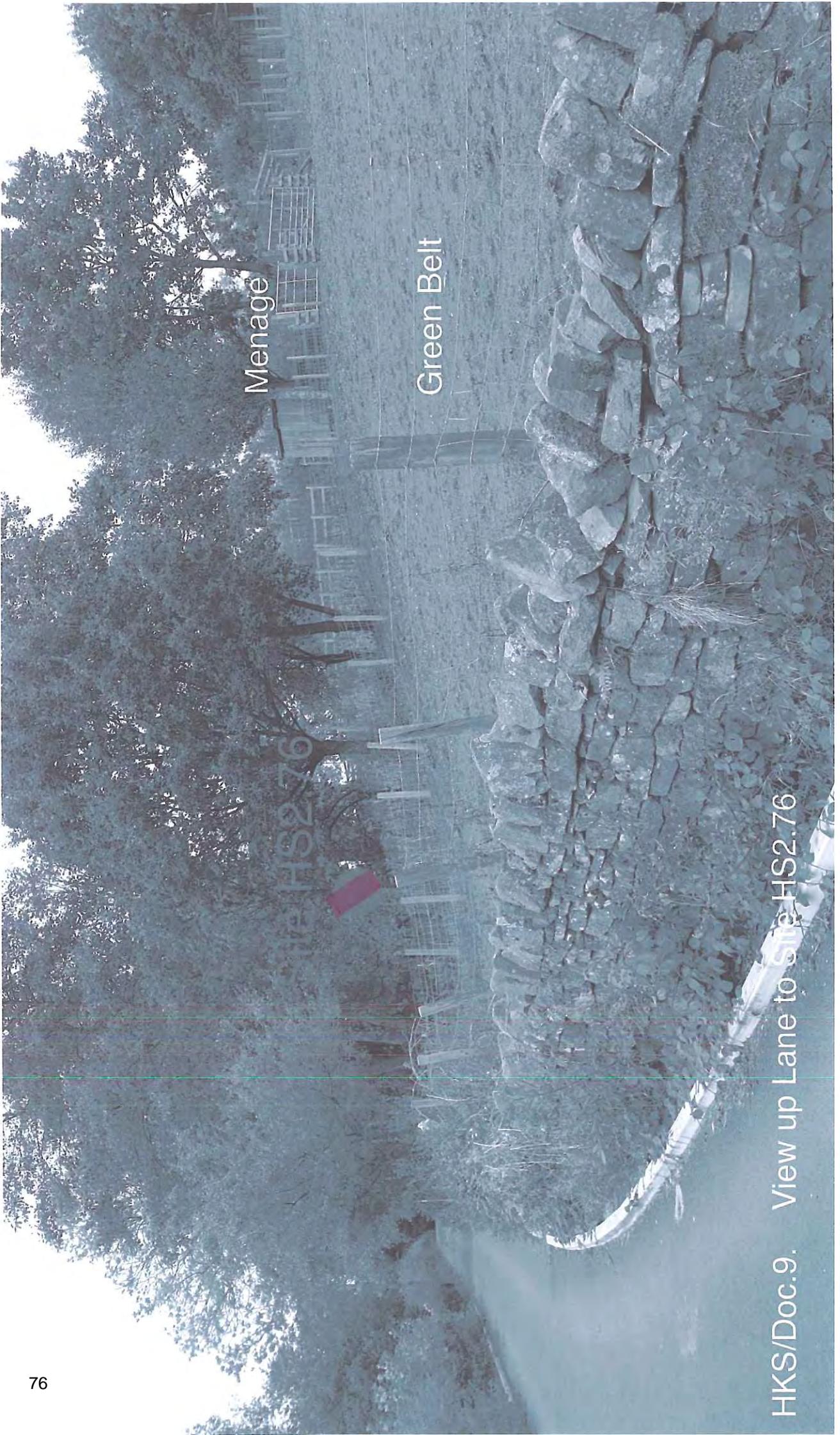
View of Drive to Tor View barn





Site HS2.76

HKS/Doc.8 Site HS2.76 (in Part)



Menage

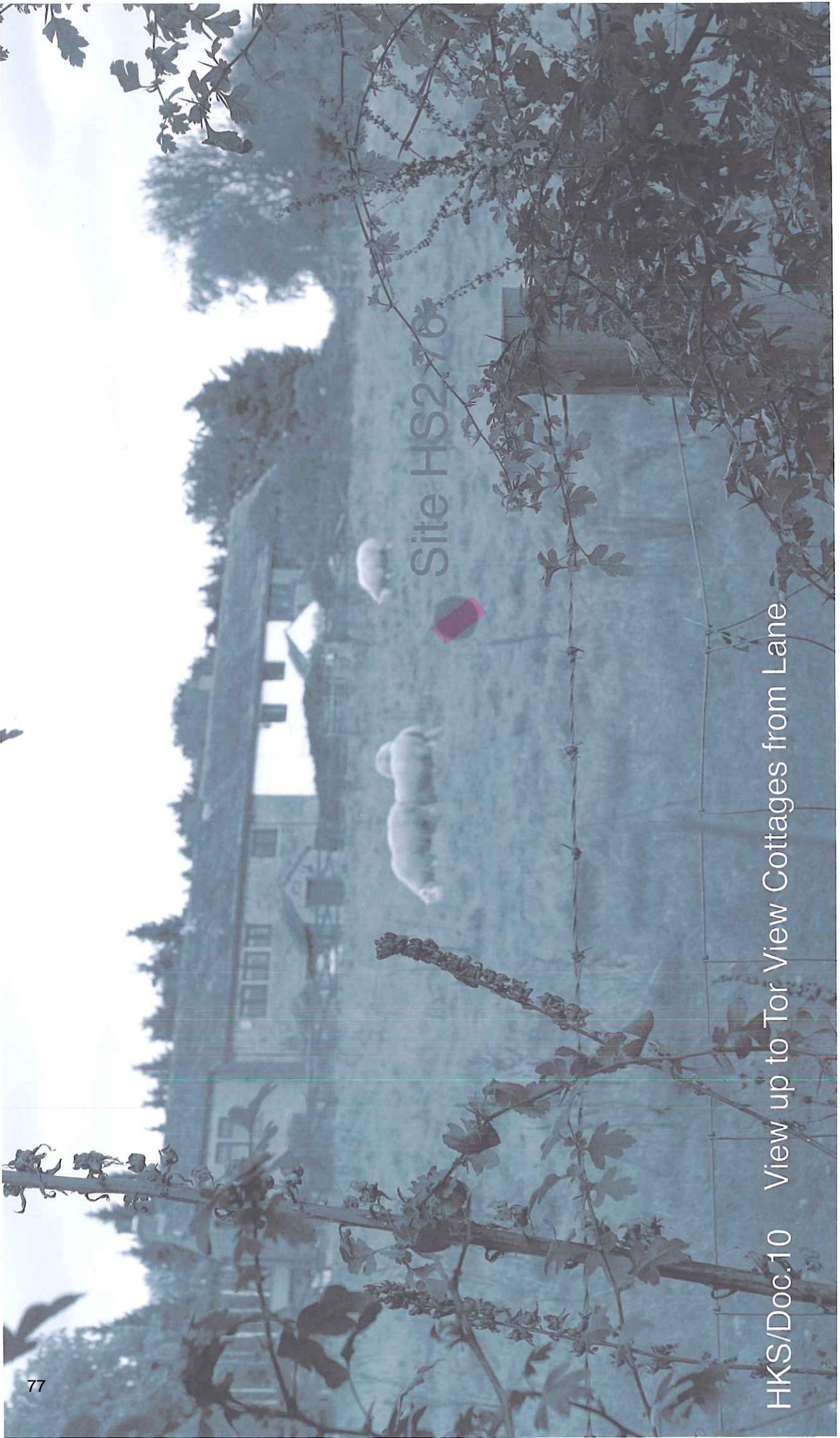
Green Belt

Site HS2.76



View up Lane to Site HS2.76

HKS/Doc.9.



Site HS276

HKS/Doc.10 View up to Tor View Cottages from Lane



HKS/Doc 11 Top View Cottages from top of Access Ramp

Rossendale Borough Council- Local Plan Review-September 2017
Draft Local Plan 2019-2034

Land HS2.76

We, the undersigned, object to the proposed change of use of the land identified as HS2.76 from land within the Green Belt to land suitable for Housing (7 houses).

The preservation of the Green Belt still remains a priority of Government policy.

We believe that, in this instance, the environmental qualities of the Green Belt should be retained for the benefit of future generations of Helmshore and not be subject to any destructive development.

Signatures collected on Sunday 17th September 2017

NAME RESIDENCE A:Helmshore, B:Haslingden, C:Rossendale or D:Other

1	A
2	A
3	A
4	A
5	A
6	A
7	A
8	A
9	A
10	A
11	A
12	A
13	B
14	B
15	B

Signatures collected on Sunday 17th September 2017

NAME RESIDENCE A:Helmshore, B:Haslingden, C:Rossendale, D:Other

16 D

17 D

18 A

19 A

20 A

21 X

22 X

23 B

24 D.

25 D.

26 A.

27 B.

28 A

29 A

30 A

31 A

32 A

33 A

34 D

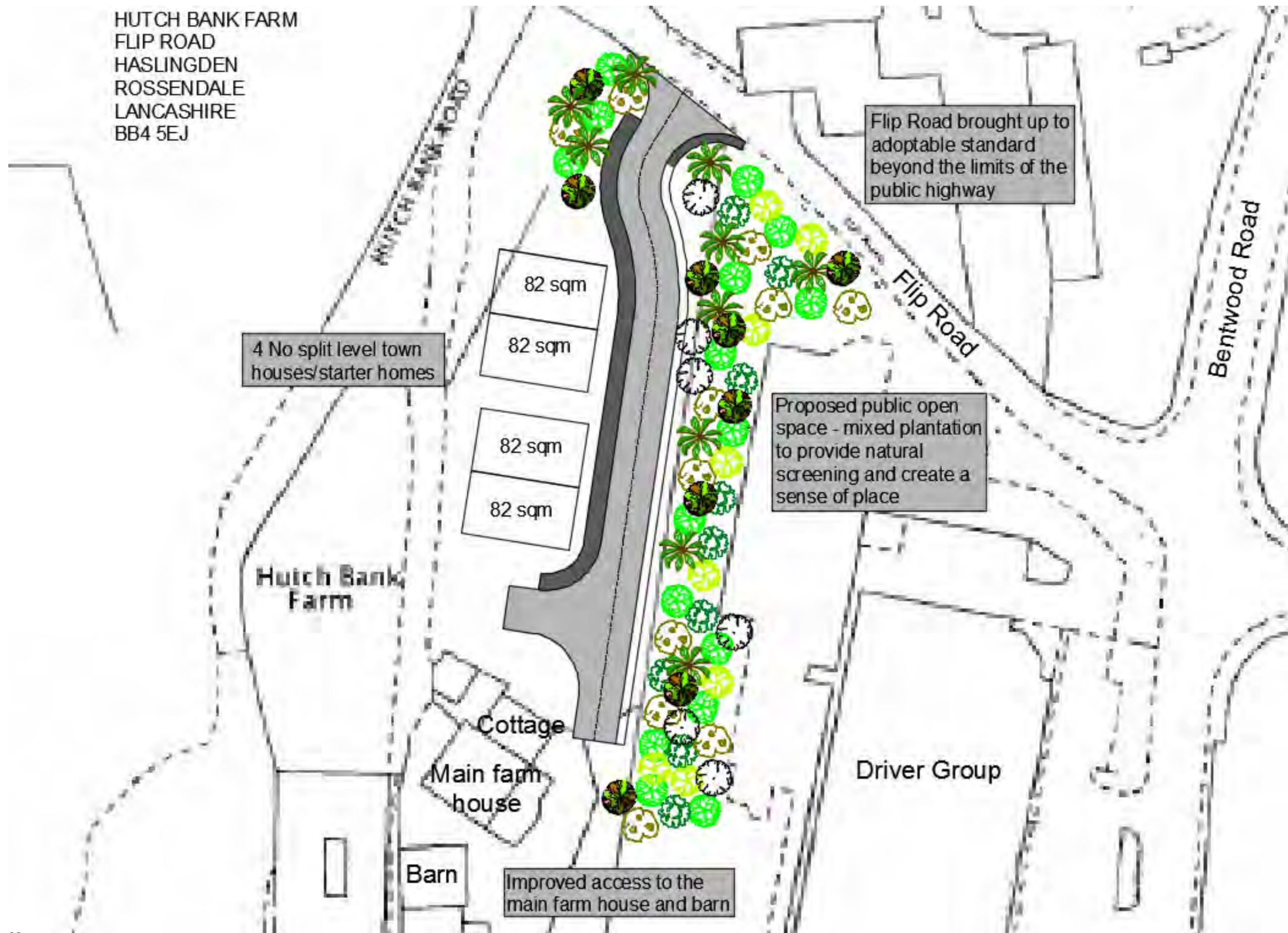
Signatures collected on Sunday 17th September 2017

NAME

RESIDENCE A:Helmshore, B:Haslingden, C:Rossendale, D:Other

34	A.
35	A
36	1
37	A
38	
39	A
40	A
41	A.
42	C
43	A
44	A
45	A
46	A
47	D.
48	A
49	A
50	A
51	A
52	D

HUTCH BANK FARM
FLIP ROAD
HASLINGDEN
ROSSENDALE
LANCASHIRE
BB4 5EJ



4 No split level town houses/starter homes

82 sqm

82 sqm

82 sqm

82 sqm

Hutch Bank Farm

Cottage

Main farm house

Barn

Improved access to the main farm house and barn

Flip Road brought up to adoptable standard beyond the limits of the public highway

Proposed public open space - mixed plantation to provide natural screening and create a sense of place

Driver Group

Flip Road

Bentwood Road

HUTCH BANK FARM
FLIP ROAD
HASLINGDEN
ROSSENDALE
LANCASHIRE
BB4 5EJ



Received 2/10/17
Added to database

615

Bacup
Lancashire

Rossendale Borough Council
The Business Centre
Futures Park
Bacup
OL13 0BB

30th Sep 2017

For the attention of the Forward Planning Department

Dear Sirs

Rossendale Draft Local Plan dated July 2017

I wish to object to the proposed housing development sites referenced HS2:11, HS2:12, HS2:13 and HS2:32 which are listed in the Housing allocations section of the above plan.

The reason for my objection is that vehicles travelling to Bacup Town Centre from each of these sites will need to use Bankside Lane. This will add to the existing traffic which already presents a significant safety hazard for me personally at the steep and narrow section between its junctions with Maden Road and Market Street.

I am disabled and have to travel to Bacup from my house via Bankside Lane either by car or whenever possible by mobility scooter. However, because the width of the pavement is very narrow I have to drive my scooter on the roadway and this means choosing the times of my journeys carefully to avoid peak congestion when it would be dangerous for me to use the road. In particular there are two sections of Bankside Lane which narrow to a single lane and where I cannot take evasive action if a hazard incident occurs.

I consider therefore that by allowing additional developments along Bankside lane and hence additional traffic hazards, the council will discriminate unfairly against me and also other disabled road users.

On this basis I ask you to remove the above housing sites from the Local Plan unless the pavement or road widths can be improved to an acceptable standard.

I attach a photograph which illustrates the difficulties.

Yours Faithfully,

Mrs Elaine Garrard

BANKSIDE LANE AT THE JUNCTION WITH DALE STREET

Both pavement and road widths are too narrow for safe use by mobility scooter.



Received 02/10/17

Linda Bohan

Rossendale

Lancashire

28-09-17

Call for Development Sites

Rossendale Borough Council

Forward Planning

The Business Centre Room 120

Futures Park

Bacup. OL13 0BB

Dear Sirs,

I wish to submit a development site to your attention for consideration for housing

When consulting on the draft Local Plan.

Yours sincerely,

Linda Bohan

FOR OFFICE USE ONLY	
Ref No:	Received: 02/10/17
Acknowledged:	

**Rossendale Local Plan
Call for Additional Development Sites
Rossendale Borough Council – Site Suggestion Form**

Thank you for taking the time to complete this form

Rossendale Borough Council is embarking on a new Local Plan. The purpose of this consultation is to identify new potential sites for development. **Please provide one form per site.**

Your Details: (Where provided, we will use the Agent's details as our primary contact)

	Your Details	Agent's Details
Name	LINDA BOHEN	
Position (if applicable)		
Organisation (if applicable)		
Address		
Postcode		
Telephone/Mobile		
Email Address		
Do you want to be kept informed about the Local Plan?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
What is your interest in the site: (Owner/Lessee/Neighbour etc.)		

Please return this form and accompanying sheets/maps etc. to the address below or via email by Thursday 24 March 2016. Please provide as much information as possible but don't be put off filling in the form if you can't answer all the questions.

Call for Development Sites
Rossendale Borough Council
Forward Planning
The Business Centre
Futures Park
Bacup
OL13 0BB
Email: forwardplanning@rossendalebc.gov.uk

Site Details : Please note that sites need to be capable of delivering 5 or more dwellings or be 0.25ha and above.

Name of site	LAND AT IRONGATE	Site Size	PART OF 7 ACRES APPROX
Address/location so we can identify the site	HOLCOMBE ROAD HELMSHORE BB4 4AN.		
Postcode	BB4 4AN		

Please provide a map showing clearly the site's location and boundaries on A4 paper. You may find it useful to visit www.rossendale.gov.uk/maps in order to print a map.

Proposed Future Use(s) e.g. Residential, Employment, Retail, Mixed-Use etc.
Please indicate the preferred use that you would like the site to be considered for.
Please also indicate any other uses you would consider acceptable.

Preferred future use	1/4 DISABLED BUNGALOWS
Alternative use(s)	

Have you previously contacted the Council about this land? YES NO

If so, when? MARCH 2017

If yes, please provide the reference number e-mail and letter sent

Any other planning history? Please provide application reference numbers (e.g. 2003/00) EXISTING PLANS FOR AGRICULTURAL BUILDING NO. 2015/0373

Site Ownership

Please record the details of ALL the site owners. If there are more than three owners, please record their details on a separate sheet.

	Owner 1	Owner 2	Owner 3
Name			
Address			
Postcode			
E-mail			

Please tick if you do NOT know who owns the site

Have all the owners indicated support for the redevelopment?				
Yes	<input checked="" type="checkbox"/>	No	Don't Know	
Market Interest Please tick if there has been any market interest in the site				
	Tick (where it applies)	Comments		
Site is owned by the developer	<input checked="" type="checkbox"/>	NEW SITE		
Site under option to a developer				
Enquiries received				
Site is being marketed				
No interest				
Not known				
Current Use of Site Please record the current use(s) of the site (or for vacant sites, the previous use, if known)				
Current Use(s)		ANIMAL GRAZING PROPOSED I WOULD BE INTERESTED IN DEVELOPING PART OF SITE OPENING ONTO HOLCOMBE ROAD PERHAPS 2-2 1/2 ACRES		
if Vacant	Previous Use(s)			
	Date last used			
Are there any buildings on this site?		Yes	No <input checked="" type="checkbox"/>	
If there are buildings on site , please answer the following question:				
What condition are these buildings in? (e.g. derelict, in use etc.)		ONLY WOODEN SHEDS		
Constraints to Development Please tell us about any known constraints that may affect development. It may be useful to provide further information.				
	Yes, No, Don't Know	Are you able to provide further information?		Comments – Please continue on a separate sheet if necessary
a) Land contamination		Yes	No <input checked="" type="checkbox"/>	PREVIOUSLY TIPPED ON WITH ASH AND HARD CORE PARTLY BY ROSSENDALE COUNCIL.
b) Is the site subject to any known stability issues?		Yes	No <input checked="" type="checkbox"/>	
c) Mains & water supply		Yes	No <input checked="" type="checkbox"/>	
d) Mains sewerage		Yes	No <input checked="" type="checkbox"/>	

e) Drainage		Yes	No ✓	
f) Flood risk		Yes	No ✓	
g) Electricity supply		Yes	No ✓	
h) Gas supply		Yes	No ✓	
i) Telecommunications		Yes	No ✓	
j) Highways/Access		Yes ✓	No	
k) Public Rights of Way		Yes ✓	No	
l) Are there any trees on the site?		Yes	No	
m) Is the site subject to covenants or other ownership or access constraints?		Yes ✓	No	PUBLIC FOOTPATH TO ONE SIDE. SHOWN ON ENCLOSED PLAN.
n) Do you consider the site to be flat?		Yes ✓	No	
o) Other (Please provide details)	BIOLOGICAL HERITAGE SITE TOWARDS RIVER TO BE LEFT UNDEVELOPED. TOP OF FIELD CLOSE TO ROAD, GAS & WATER SUPPLIES.			

Site Availability

When do you believe this site could be available for development? Please circle.	Immediately ✓	Within 5 Years ✓	Longer than 5 Years
--	---------------	------------------	---------------------

Any Other Information

Please tell us anything else of relevance regarding this site, if not already covered above. Please use a separate sheet if necessary.

Data Protection

Please note that the information you provide (apart from personal details) may be publicly available.

Disclaimer

This information will be used to inform the Council's SHLAA. It is not an application for planning permission, nor indicates that planning permission will be granted. It may be used as a material planning consideration in the determination of planning proposals.

Further information and copies of the form is available at www.rossendale.gov.uk/localplan

9x Disabled bungalows Planning application



To be built in stages

A C shape crescent of rustic brick and dressed stone properties

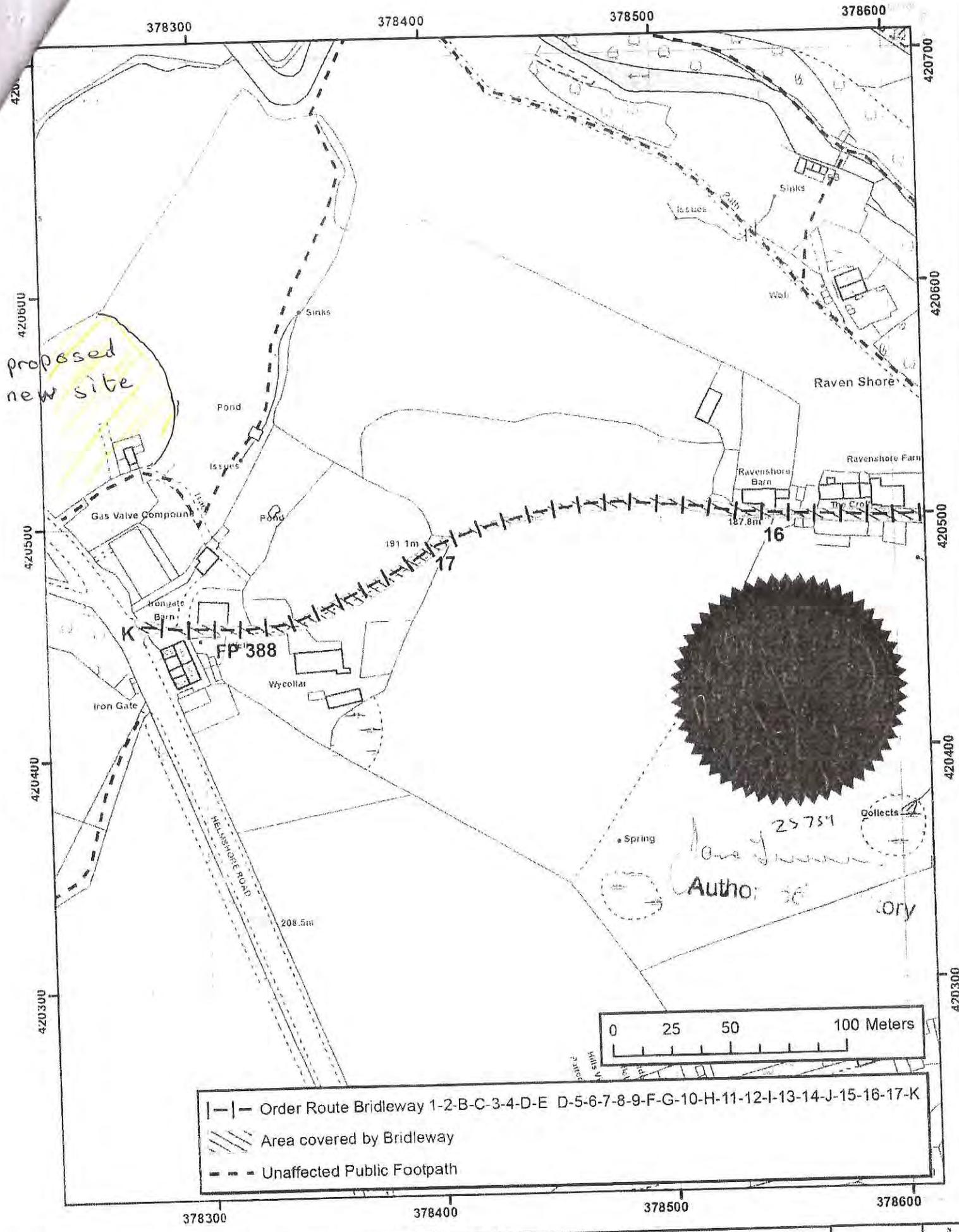


A crescent of 7-9 disabled 1 or 2 bedroom bungalows

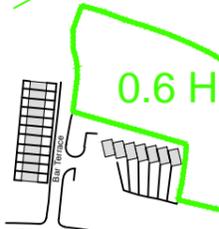
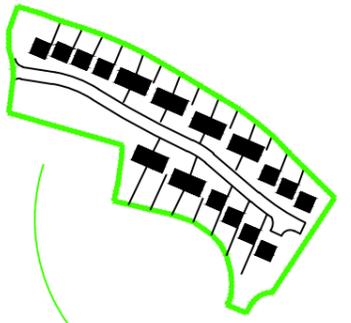


Mark area I am interested in developing.





① 18 - 23 POTENTIAL
ADDITIONAL UNITS
LAND ADJACENT TO
BAR TERRACE OL12 8TB



Untitled Map
Write a description for your map.

Rev.	Date	Description	By	Project	Scale	PRESTWICH DESIGN GROUP	
				Land at Tonacliffe Farm Whitworth, Nr Rochdale, Lancashire OL12 8SW	Refer to Scale Bar		
Content	Drawing no.	Rev.					
		Proposed Development Sites	01	A	Drawn by	Date	253 HALE ROAD, HALE, CHESHIRE Tel: 0161 904 8686 Fax: 0161 904 5331
					JHRW	04 Oct 17	

Fw: Urban Boundary at Lomas Lane, Balladen

From:
Sent: 17 April 2014 09:43
To:
Subject: Urban Boundary at Lomas Lane, Balladen

Hello Thank you for your very full reply to my email.

Firstly, yes, I would like to be included on the list of consultees for the next stage of the boundary revision process please .

Secondly I would like to propose an amendment to the current urban boundary insofar as it affects Balladen hamlet. As I previously explained, I cannot find any reason/justification in the records why Bess Nook cottages and Plane Tree House were included in the urban boundary. I can only imagine that the reason for this extraordinary "finger" extending out from the coherent boundary, is that, at some time, someone decided that : either all properties to the west of Lomas Lane should be included in the urban boundary or; that all properties to the north/north east of Balladen Brook should be included. Neither of these explanations stands up to serious scrutiny.

If the former was applied, Horncliffe Mount Farm and Sheffield Gate Cottage would have to be included. If the latter reflects the rationale, all the properties in Balladen hamlet, with the exception of Oak Villa, Horncliffe Mount Farm and Sheffield Gate Cottage would have to be included!

Bess Nook Cottages and Plane Tree House have always been not only at the gateway to the hamlet but very much part of it. Both date back to the early 19th century . Their membership of the Balladen (countryside) hamlet is further and, in my view, convincingly reinforced by the local topography.

Balladen Brook flows down behind Plane Tree House and Bess Nook and, after it has passed them, flows in a northwesterly direction down along the rear of Redwood Drive which forms the edge of the current urban boundary. This "edge" is in fact a very steep escarpment which,

importantly, runs, increasingly steeply, from Lower Clowes in a southeasterly direction towards Balladen before swinging eastwards, behind (to the south of) the Cherry Crescent cul de sac, until it meets Lomas Lane north of Bess Nook. The Brook itself flows in a deep ravine which broadens just to the north of Bess Nook where another water course, previously dammed to make a (now redundant) lodge, joins it. This steeply descending water course is bounded to the north by the escarpment to which I refer above.

The import of all this is that, between the cul de sac of Cherry Crescent and Bess Nook there is a huge, natural divide - not just a road or a hedge but a steep gulley/ravine which effectively separates Balladen hamlet from its nearest urban neighbours and, one could argue, creates its unique identity.

The current "extended finger" of urban boundary into the countryside at Balladen hamlet makes no sense in terms of coherence, planning, history, topography or simple logic. It is, in short, an aberration. However, thankfully, it is one which can be simply corrected by making the urban boundary coterminous with the southern boundary of the Redwood Drive/Cherry Crescent housing estate. I enclose a map (rather amateurish I'm afraid) which I hope illustrates the points I am making.

I hope that these comments are helpful to you in your review of the urban boundary and that you will agree with my analysis and proposal. Would you please be kind enough to acknowledge receipt of this email? Thank you.

Regards.....David Ashworth

Rossendale Local Plan Consultation Summer 2017

Q1. Data Protection The information you provide will be processed in accordance with the Data Protection Act of 1988. As we are required to make all representations available for public inspection, representations cannot be treated as confidential. All representations will be retained in full by Rossendale Borough Council and will be available for public viewing at the Council offices at the Business Centre, Futures Park, Bacup, OL13 0BB. The respondents address, postcode, phone numbers, email addresses and signatures (where given) will remain confidential.

Personal Details	
Title	Mr
First Name	Paul
Last Name	Turnbull
Organisation (If Applicable)	
Address	
Postcode	
Phone No.	
Email Address	

Q2. Agent Contact Details (If Applicable)

Personal Details	
Title	Mr
First Name	Ken
Last Name	Whitaker
Organisation (If Applicable)	white acre estates
Address	
Postcode	
Phone No.	
Email Address	

Q3. Do you wish to be notified about further consultations on the Local Plan?

Yes

Page 3: Commenting on a policy

Q4. Are you commenting on a Local Plan Policy or a Proposed Site Allocation?

Site Allocation

Q5. What is the name of the policy or proposed site allocation you are commenting on? E.g. High Quality Development in the Borough or Proposed Housing Site at Anvil Street, Bacup

Q6. To help us process your response please provide the Policy Reference or the Site Allocation Number as listed in the Draft Local Plan (if known) E.g. HS2.13 Please try to be as accurate as possible.

HS2.73

Q7. Do you wish to support or object to this Policy or Site Allocation?

Support

Q8. Comments. (This box allows a maximum of 2,000 characters).

On behalf of the land owners we support the allocation of this site for residential development.

The site, due to its location, does not serve any of the purposes ascribed to Greenbelt as outlined in paragraph 80 of the NPPF. The site also already has had the benefit of a planning permission for redevelopment (2004/513) which established the suitability of the site for residential use. There is acknowledged local need to see the site brought back into use.

The land owners are committed to bringing this site forward for development within the 1-5 year period, not the 6-11 year period suggested in the SHLAA. To assist in this process the land owners have already commissioned surveys and reports including:

Highways report and access design; Topographical survey; Ecological survey; Architect layout design and site masterplan

The site can accommodate between 30 and 35 units.

The site is adjacent to SHLAA site 16270. The proposed allocation of this adjoining site for development will allow for the simpler and more effective redevelopment of both sites. In particular the possibility of creating an alternative access to Edenwood Mill will give greater flexibility over the future design response to the mill site and remove one of the main constraints identified in the SHLAA site assessment. There are practical benefits in developing proposals which deal with certain technical matters which affect both sites such as drainage, access and services. It is most likely that the sites would come forward together in the 1-5 year period.

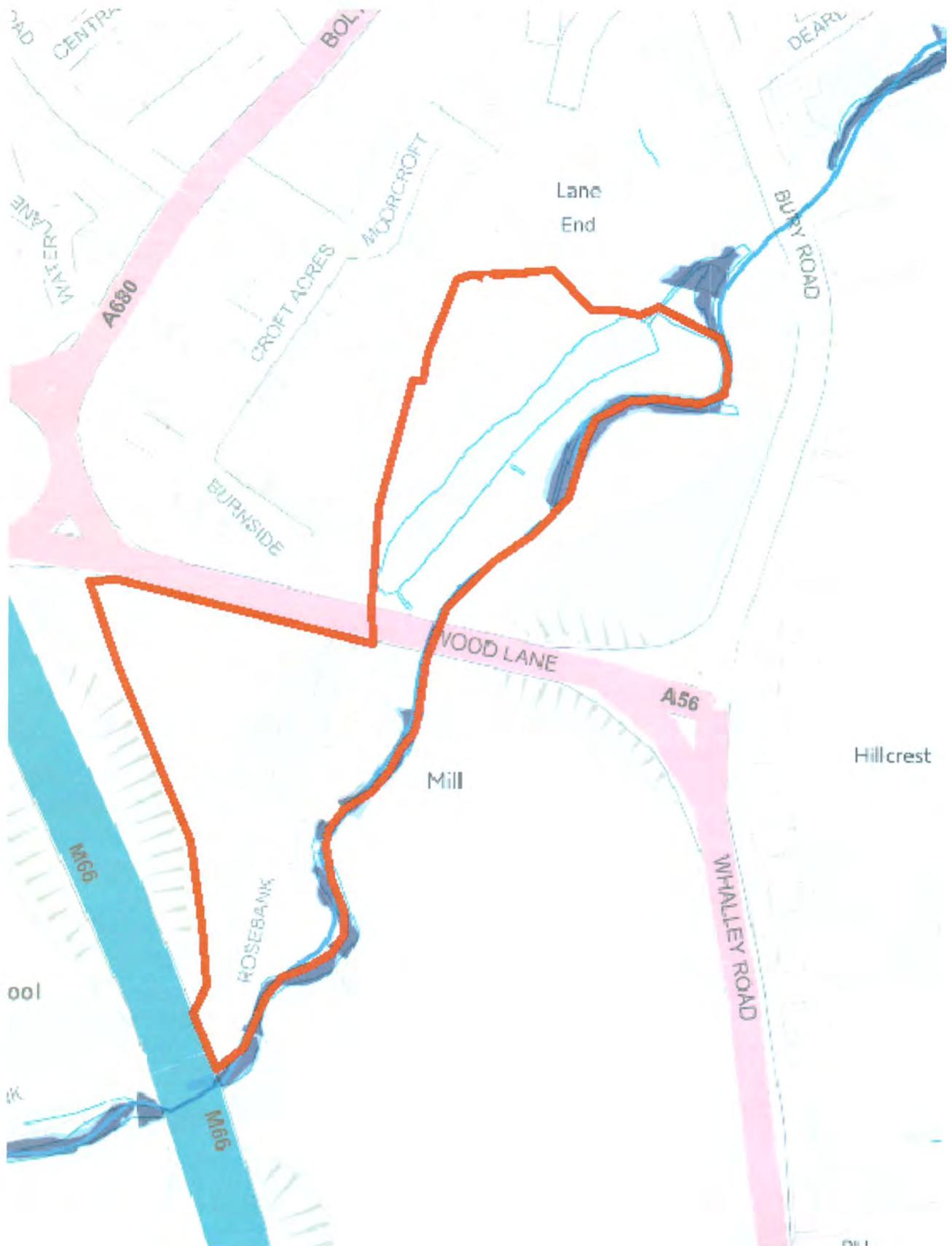
The extent of the brownfield element of the site is incorrectly shown on the proposed HS2.73 site designation. The extent of the previously developed land is much greater and includes the mill pond, outbuildings and hardstanding areas. An initial assessment of the site potential shows it can accommodate up to 30 units. The site area plan needs to be corrected to include all the PDL, and the number of units increasing to match the potential 25-30 units supported both the site area and the previous consent. A separate plan has been provided to show the correct extent of the site and has been sent via email

The site is deliverable, available and suitable for new housing and its allocation for housing would result in new homes being built on site early in the plan period. The principle of at least 25 units on the site has already been established by the previous consent.

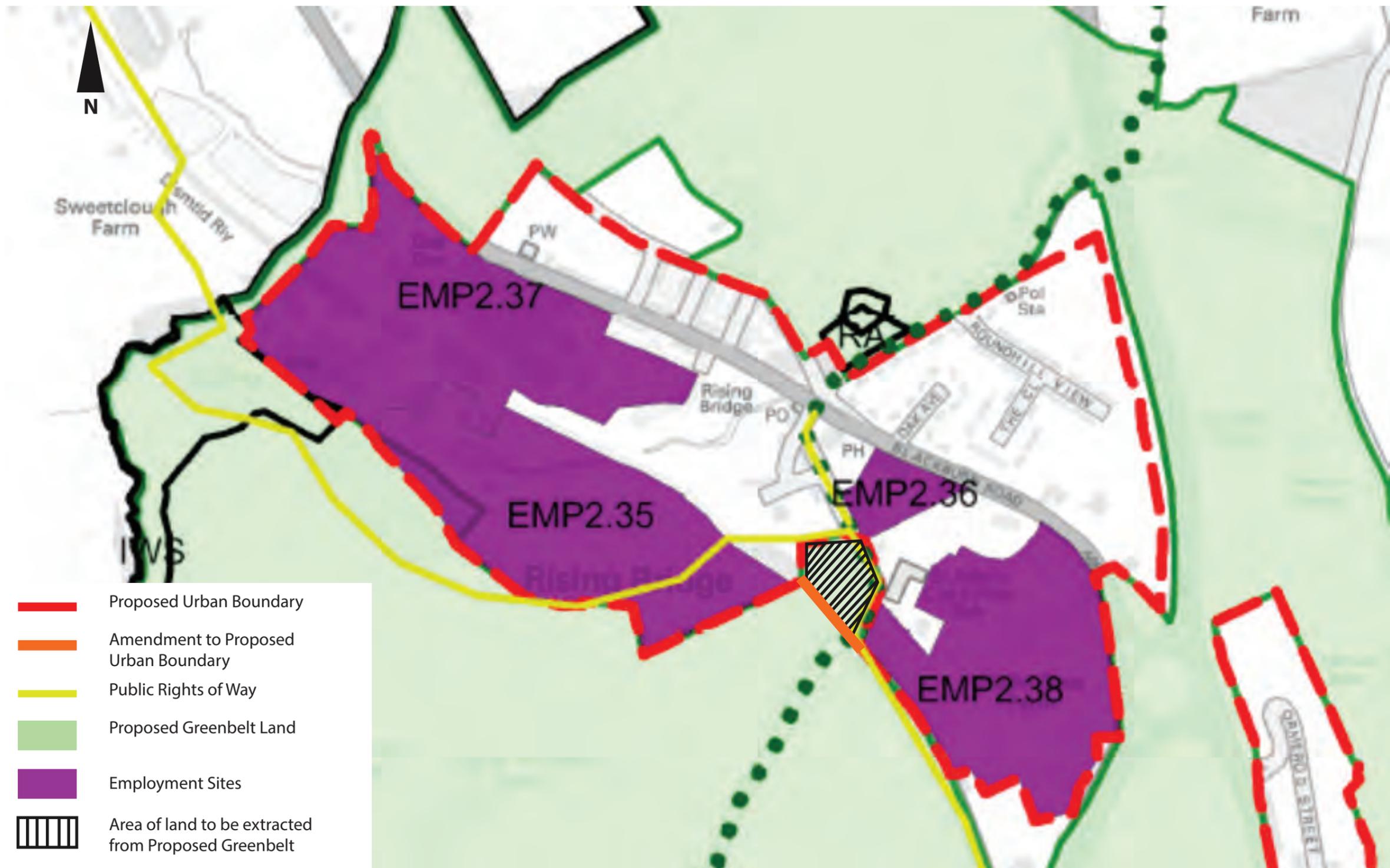
Q9. Do you wish to comment on another allocation, policy or paragraph?

No

HS2.73 Corrected Site allocation/previously developed land plan October 2017



'Response to Rossendale Local Plan'



Rossendale Local Plan Consultation

Summer 2017

Commenting on a policy

The comments below are provided as **SUPPORT** to the conclusion of the SHLAA in relation to site identified as **No 16105** (Waterbarn Chapel, Rakehead Lane and adjoining land Stacksteads). The conclusion states: “not developable or not to be included in the SHLAA” and describes its development potential as, “not suitable”. The SHLAA justification references that the land as “high surface water flood risk” and is also “contrary to the Playing Pitch Strategy”.

The Chapel itself being a derelict Grade II listed building with graveyard, as described under the **Planning (Listed Buildings and Conservation Areas) Act 1990** - list entry number 1361948, and the land being a long-term substantial greenfield area well used by resident and other bodies.

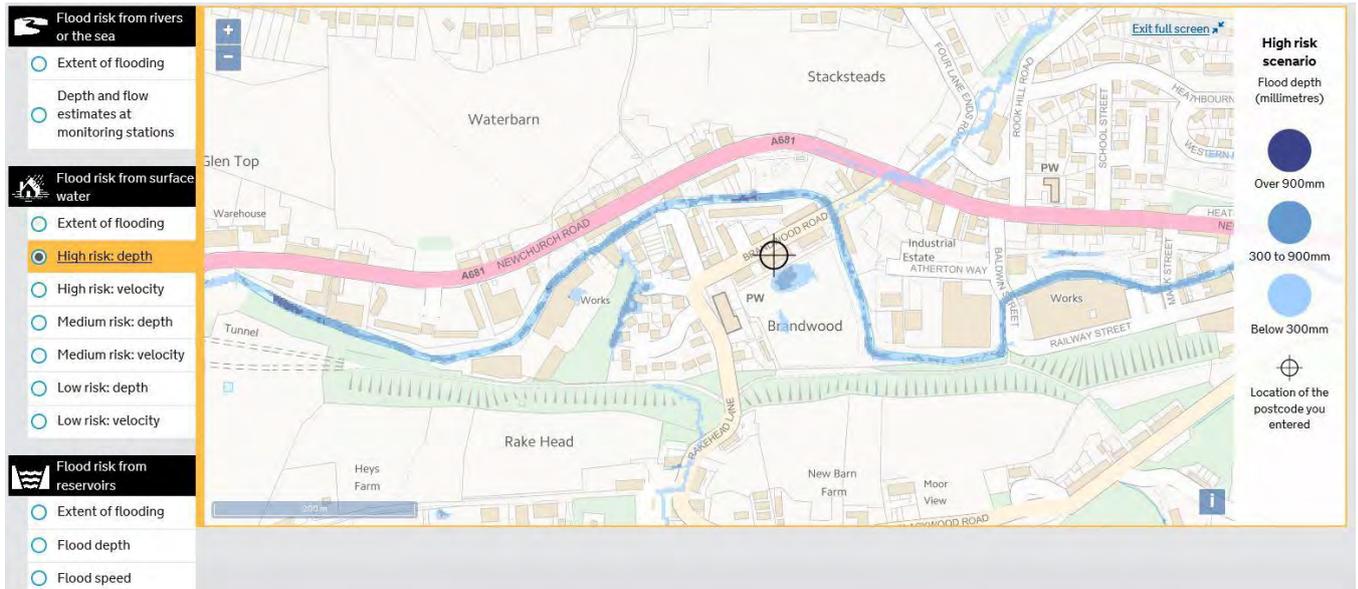
1. CURRENT POLICY AND DEIGNATION

The site is currently designated as “Recreation” in guidance (**Local Plan Policy E2 of the “Continuation of Local Plan: Saved Policies through the Core Strategy DPD” document, dated 2010**) and is registered with Sport England as an active sport facility (Site ID 1208540). It has been used as such for over 100 years by the local community, and a great loss if allowed to be developed. In fact the Council’s own commissioned Playing Pitch Strategy, dated April 2016, for the borough recommends protection of all existing facilities due to a shortfall in sporting provisions.

2. FLOOD RISK

The Environment Agency has produced maps indicating an area of high degree of flood risk of the land and the attached map indicates their view of degrees of risk of flooding from low to high. Their “high risk” area indicates a minor percentage of the site area and is reflected in the Local Plan assessment criteria sections.

However, actual flooding of the land which has recently, and physically occurred, was more extensive than that indicated by the Environment Agency (see next page):



The photo below shows the land actually flooded during Storm Eva on Boxing Day 2015 (taken from the north side of the land – River Irwell to left of photo) the result of which ultimately flooded existing Victorian terraced properties bordering the north boundary to a depth of some 2-3 feet:



3. **SITE ACCESS** – (graveyard / sight lines / Jnctn of Brandwood Rd and Newchurch Rd)

The only vehicular access available within the ownership boundaries of the site (Chapel and Land) requires an access point to link with an existing highway situated over the open land to the side and behind the Chapel, which would also have to cross the existing graveyard (whose remains are numerous and include a Rawtenstall notary, Lord Tricket, a peer of the realm). Due to the juxtaposition of high neighbouring walls and the Chapel building itself this junction will fall foul of **Tables A & B of the Development Control Advice Note 15 for Vehicular Access Standards**, which show the “sight-lines” required at junctions. Development would also impact the number of vehicles using an existing restricted width junction between Brandwood Road and Newchurch Road.

4. **PROPOSED DEVELOPMENT SITE DENSITY / OWNERSHIP**

I note the SHLAA indicates housing numbers on the site as “Yield Calculated 32”, but also “Yield Proposed by Applicant 42”, as per an initial proposal block plan; which I understand was discussed with Planners by a previous owner, as part of a pre-application meeting. You may be aware the site has recently changed ownership, having been sold via a property auction site in early September 2017 to a company called TMJ Contractors Ltd, based in Ashton-under-Lyne (contact telephone:xx). Therefore, it is now uncertain what the current owners propose for development numbers and therefore assumptions made in the SHLAA need to be removed/corrected.



5. Eco Viability

Chapter 4 of the **Core Strategy DPD document adopted in 2011**, and in particular AVP2 covering Stacksteads, inter alia, states “The area’s distinct sense of place is to be retained and enhanced, with vacant sites and buildings to be occupied and open spaces retained “. By changing land use from Recreation to Housing does not support the spirit of this directive.

Item No 6 of Policy 2 of the **Core Strategy DPD**, states that housing development should safeguard “the character of established residential areas from over-intensive and inappropriate new development”, and Item 7 requires the prioritising of “the development of previously developed land. However, development of un-allocated greenfield land will be permitted where:

- i. It is for 100% affordable and/or supported housing schemes; or
- ii. It forms a minor part (upto 15% of overall site size) of a larger mixed use scheme or major housing proposal (10+ dwellings) on previously developed land or
- iii. It delivers a significant social, economic, or environmental benefit

Item 3 of Policy 3 of the same DPD document states development in “ ...Stacksteads... will be permitted having regard to ... capacity of infrastructure”

Item 2.a of Policy 4 of the same DPD document states that affordable/supported housing should be “a minimum of 30% on Greenfield sites over 8 dwellings...” and in 2.c “unless otherwise agreed with the Council, a relaxation of the above requirements will only be considered if ... development being financially unviable ... based on viability assessment approved by the Council.”

I contend that the proposal to allow development fails to comply with all of the above criteria of existing/adopted Core Strategy DPD documents, as the character of the area will be significantly affected by the loss of such a large and well used community space; the local road infrastructure is insufficient to take additional vehicles; the other local infrastructure facilities are insufficient e.g schools, businesses, replacement recreational space etc; the area is well catered for in affordable housing as Together Housing have a large stock already and any such proposed additional stock (“100% on un-allocated greenfield land”) would skew the mix with existing standard residential facilities

6. Other Factors

The land has been used several times by the Helicopter Emergency Service for major trauma cases from nearby industrial facilities. There is no other facility near to these industrial sites, and loss of this open space negates this optional and vital use.

7. Conclusion

In lieu of all of the above I would request the SHLAA conclusion remains intact and not changed to facilitate change of use of the land from its current designation, and thus allow any development of housing.

By email

Dear Sir/Madam,

Re: Rossendale Borough Council Regulation 18 Local Plan Consultation - Representation to Consultation on the Draft Local Plan (2019-2034)

I am planning professional and manage a team of development management officers within a neighbouring authority, although I write this representation in my capacity as a resident of the Rossendale Borough. I have lived in the Borough since 1988 with the exception of intervening periods of work and study. In a professional capacity, I have experience in local plan processes both pre and post adoption of the National Planning Policy Framework and have previously accompanied an appointed Core Strategy Inspector on viewings of sites proposed to be allocated for development.

I recently attended the Draft Local Plan (2019-2034) consultation event at Futures Park and would like to extend my thanks to _____ who was approachable, welcoming and helpful to myself and other members of the public at this event.

I understand that the Council resolved to withdraw the Draft Local Plan Part 2 – Site Allocations and Development Management Policies DPD (2015) on 24th February 2016 and commence work on a new local plan to replace the Adopted Core Strategy (2011). The Draft Local Plan (2019-2034) includes the allocation of land for development and the release of land from the Green Belt.

This representation contains comments in support of some proposals within the Draft Local Plan (2019-2034) and in objection to others. For the reasons set out below, I am of the opinion that the Regulation 18 consultation has been compromised and could be considered unlawful. I would welcome the opportunity to discuss these comments in more detail should this assist Rossendale Council in producing a robust Submission Version of the Local Plan that will withstand scrutiny at examination.

Comments in Support

The withdrawn Draft Site Allocations document proposed the allocation of land currently used as playing fields for development in Whitworth. Playing fields provide a valuable resource for communities, making a significant contribution to the social dimension of sustainable development and the health and wellbeing of local communities. I welcome the omission of these proposals from the Draft Local Plan (2019-2034).

Mixed Comments

I welcome the proposal to allocate land for employment development in Haslingden. However, I am of the opinion that, without prejudice to the site specific comments below, insufficient land is proposed to be allocated for housing in both Haslingden and Rawtenstall, the most readily accessible areas in the Rossendale Borough with good motorway and public transport links to Manchester,

Lancashire and the wider Greater Manchester area. The allocation of land for employment in Haslingden and the promotion of employment opportunities should go hand in hand with the allocation of land for residential development and the creation of new homes in the Borough's two most accessible areas, Haslingden and Rawtenstall.

The under provision of land for residential development in Haslingden and Rawtenstall leads to a resultant overprovision of land for residential development in other areas, namely Whitworth and Edenfield.

Whitworth has significant accessibility constraints due to the fact it is linear in character - the Council's Adopted Core Strategy (2011, page 37) identifies this as a constraint ('.....with the main road a single carriageway so improvements are limited...'). Although it is part of Rossendale, the closest town is Rochdale to the south. There are only two routes to Rochdale from Whitworth: the A671, which leads to the junction of Whitworth Road with John Street, St Mary's Gate and Yorkshire Street - a signalised junction known as 'Townhead'; and the B6377, which leads to the junction of Falinge Road and Sheriff Street (a roundabout). At peak times and predominately during the morning (AM) peak, these junctions operate over capacity, with significant queuing of in excess of 20 minutes to pass through these junctions. Of particular concern is the roundabout, which from my observations appears to exceed absolute capacity in the AM peak. There is an added complication in respect of highway infrastructure as both of these junctions are in Rochdale and appropriate mitigation would therefore require input from Rochdale Borough Council.

In addition, the Infrastructure Delivery Plan identifies a need for health and education facilities in Whitworth (the single local doctors surgery has over 900 patients registered and Whitworth primary school has very limited capacity), but no land is proposed to be allocated for health purposes and the Infrastructure Delivery Plan proposes education 'improvements will be dealt with on a case by case basis'.

Edenfield is a village and its character would be irreversibly damaged should land be allocated for 500 homes in 2019-2034. Whilst I support the allocation of land for residential development in Edenfield in principle, the scale of the expansion proposed is excessive and should be reduced as it would result in significant harm to the social dimension of sustainable development.

Comments in Objection

Inadequate consultation

The Regulation 18 consultation is flawed in that it proposes release of land from the Green Belt without justification and for no identified purpose. The consultation in this respect misleads members of the public and consultees and conflicts with both the National Planning Policy Framework and relevant case law. The National Planning Policy Framework is clear that land may only be released from the Green Belt in exceptional circumstances and case law (IM Properties Development Ltd v Lichfield DC [2015] and Gallagher Homes Ltd v Solihull Metropolitan Borough Council [2014]) has established that the production of a local plan is in itself not sufficient justification for land to be released.

Paragraph 2.25 of the Green Belt Review Report states:

- 2.25 Meanwhile, case law confirms that Green Belt alterations require 'exceptional circumstances' to be demonstrated by the local planning authority. The relevant legal principles established in *IM Properties Development Ltd v Lichfield DC* [2015] EWHC 2077, are particularly as follows:

"In Gallagher Homes Ltd v Solihull Metropolitan Borough Council [2014] JPL 1117, para 125, Hickinbottom J helpfully gathered together a number of the relevant principles regarding the Green Belt.

Firstly, the test for redefining a Green Belt boundary has not been changed by the NPPF.

Secondly, the mere process of preparing a new local plan is not in itself to be regarded as an exceptional circumstance justifying an alternative to a Green Belt boundary.

Thirdly, the test for redefinition of a Green Belt under the NPPF remains what it was previously: exceptional circumstances are required which necessitate a revision of the boundary. That is a simple composite test because, for this purpose, circumstances are not exceptional unless they necessitate a revision of a boundary.

Fourthly, whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a plan-maker may err in law if it fails to adopt a lawful approach to exceptional circumstances.

Fifthly, once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration. Hickinbottom J's fifth point was endorsed on appeal: the Gallagher Homes case [2015] JPL 713, paras 33 and 36."

Gallagher Homes Ltd v Solihull Metropolitan Borough Council [2014] clearly established that a plan-maker may err in law if it fails to adopt a lawful approach to exceptional circumstances. The Draft Local Plan (2019-2034) proposes the release of land from the Green Belt at Lower Fold Head Farm, Whitworth (**Figure 1**) but does not clearly identify the intentions with regards to this released land (illustrated by the Key for the Policies Map 2017 at **Figure 2**, which does not define what this land will be designated as) and this is a clear failure to adopt a lawful approach to exceptional circumstances. There may be other such instances in the Draft Local Plan.

As a planner, I am able to deduce from this that the land may become 'Countryside' or 'Safeguarded Land', but even I am unclear whether the release is for one of these purposes or another purpose altogether and thus what the justification and exceptional circumstance for the release may be. I have therefore been prejudiced by this as I am unable to comment fully on the proposals as they are unclear. I am not able to come to a conclusion with regards to whether the Green Belt release can be justified in accordance with case law and meets the exceptional circumstance test in the National Planning Policy Framework.

If it is unclear and has caused prejudice to me, it will not be clear to members of the public or statutory consultees. The fact that the land proposed to be released from the Green Belt at Lower Fold Head Farm is not proposed to be allocated for any intended purpose is unlawful for it fails to satisfy the exceptional circumstance test necessary for the release to be permitted in any event. This element of the plan conflicts with the National Planning Policy Framework and presents a significant risk of challenge should the plan be progressed as proposed.

Figure 1 – Green Belt Release at Lower Fold Head Farm

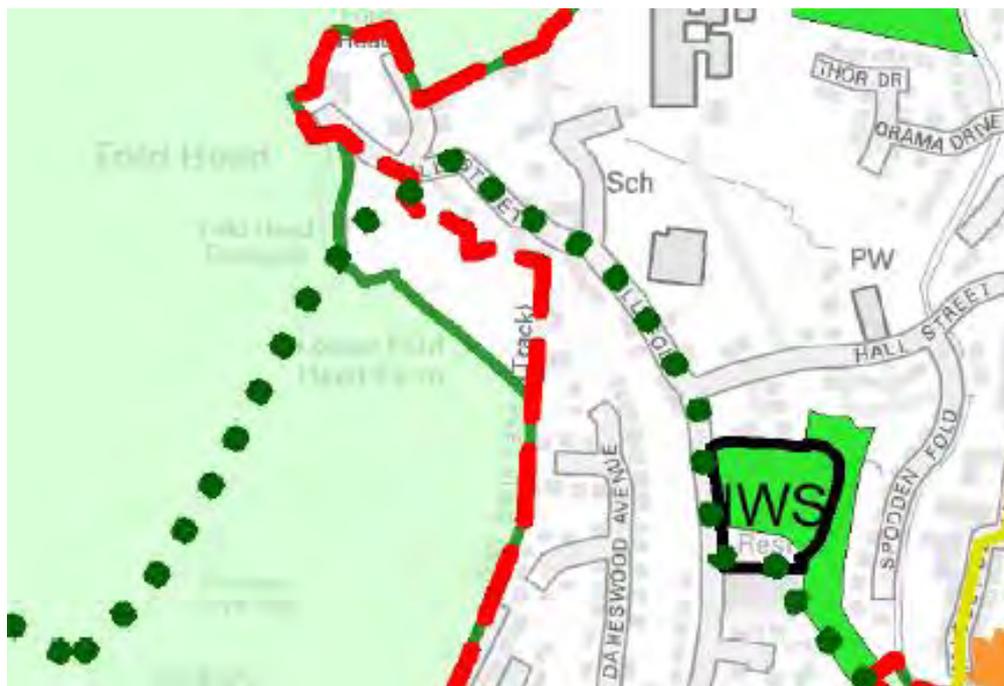
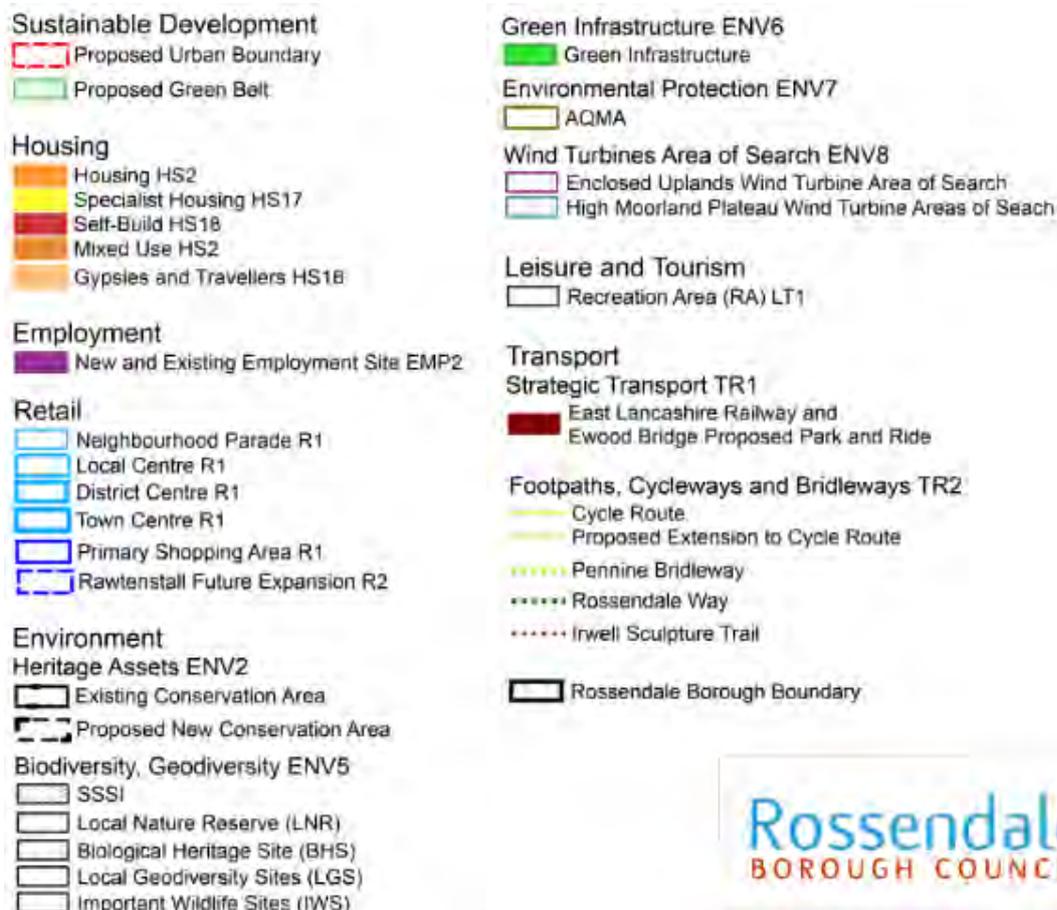


Figure 2 – Policies Map Key



The only potential means by which the failure in the Regulation 18 Consultation can be remedied are:

1. The omission of the proposed release of land at Lower Fold Head Farm from the Green Belt from the Publication/Submission Version of the Local Plan.
2. A revision to the Policies Map to ensure all land proposed to be released from the Green Belt is appropriately allocated for whatever purpose it is intended to be released for, otherwise there can be no justification to release the land from the Green Belt. Any such revision would necessitate a new Regulation 18 Consultation.

Site Specific Representations

I **support** the allocation of **HS2.102** for housing at Market Street, Whitworth and would encourage the Council to actively support the development of the land through bids for funding to address contamination issues that may inhibit the development of the land.

I **object** to the allocation of **HS2.33** for housing at Kirkhill Avenue, Haslingden. This allocation comprises Areas A and B of the Kirkhill and Moorland Haslingden sites of the Landscape Study Document (2015). This document identifies that these parcels are not suitable for development on landscape grounds, in particular Area B, which would result in moderate to substantial adverse harm to the landscape. The proposed allocation directly conflicts with the evidence base. The Landscape Study Document (2015, pages 152-157) identifies Areas C and E of the Kirkhill and Moorland parcel as potentially suitable for development with mitigation. Area E is to the north of Brynbella Drive within the under construction Taylor Wimpey development at the Former Rossendale Hospital Site (known as Dale Moor View) and this should be allocated for housing instead of HS2.33 on the grounds that: it is a logical phase 2 of this recent development; the infrastructure is already in place for this to be brought forward in the short to medium term, with a signalised junction at Union Road/Haslingden Road and potential for access from Brynbella Drive; and it would be in line with the Landscape Study (2015) which identifies only a moderate degree of harm would arise, which is far less harm than would arise from the allocation of HS2.33 (moderate to substantial adverse harm). In addition, the requirement to bring the entirety of Hillside Road/Kirkhill Avenue to adoptable standards presents a challenge to the delivery of the housing allocation.

Release of Land from the Green Belt at Lower Fold Head Farm, Whitworth

In addition to the comments above, I object to the release of the above on the following grounds:

1. Paragraph 4.6 of the Green Belt Review identifies that it *'only considers the relative performance of the Green Belt; it does not consider the exceptional circumstances required to demonstrate the need for Green Belt release, or the range of other constraints that may inhibit sustainable development e.g. ecological, archaeological, infrastructure, social and economic constraints.'*
2. Notwithstanding that the failure to allocate the land for any purpose does not meet the exceptional circumstance test and is contrary to established legal principles, no assessment of site constraints or justification for the release of the land has been undertaken by the Council.

3. No landscape assessment has been undertaken for this proposed release.
4. Development on this land as suggested by the Green Belt Review document (page 52) would result in a significant adverse impact on the landscape character and would significantly encroach into the countryside (Photographs of this parcel are in **appendix 1**)
5. There is no realistic prospect of the land coming forward to meet unmet development needs in future as there is no feasible means of access to the land. Hall Fold is single vehicle width and due to the topography and character of the area, I can see no feasible means by which the carriageway could be brought to adoptable standards to facilitate access for development purposes (**photos 1 and 2 below**). The development of the land would not meet Lancashire County Council's highways requirements or those of the Lancashire Fire Authority. Access and accessibility have not been considered.

Photo 1 – Junction of Hall Fold with Hall Street



Photo 2 – Junction of Hall Fold with Wallbank Lane



6. There is a clearly defined boundary to the Green Belt at this point – the eastern boundary is formed by a dry stone wall that is a retaining wall of significant height in parts (in excess of 2 metres in height).
7. The proposed boundary of the Green Belt would result in an irregular and angular boundary that would harm the openness of the remaining Green Belt and present a significant encroachment into the countryside.
8. It would lead to pressure for development in future that would compromise the farm holding of Lower Fold Head Farm.
9. It would be harmful to the Rossendale Way.
10. The parcel performs strongly against purpose 1a and 1b, performs strongly against purpose 3 moderately against purpose 4 (**Parcel 74 – Green Belt Review Below**). Development within the parcel would not form a coherent extension to the current settlement edge and would introduce an element of sprawl. The parcel is open pastoral land and displays strong characteristics of the open countryside and has a relatively intact rural character. Releasing the identified sub-area would have a substantial negative effect on the integrity of the Green Belt and would result in a high degree of harm that, given the elevated nature of the land (standing some 3 metres higher than Wallbank Lane) could not be mitigated by ‘planting’ as suggested in the Green Belt Review.
11. Paragraph 5.4 page 55 of the Green Belt Review states *‘It is important to note that the conclusions reached in this study, do not state that the parcels identified should be released from the Green Belt; as the consideration of further constraints by the Council will be required to ensure that any development is sustainable. It is also recommended that any identified land parcels are considered as part of the wider work undertaken by the Council to identify key housing and employment sites and land and tested through the Sustainability Appraisal process, as part of a robust approach to develop the future development strategy for Rossendale.’* There is no document that demonstrates the Council has considered any such constraints.

Parcel 74 – Green Belt Review

Parcel ref	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
74	Strong	Strong	No Contribution	Strong	Moderate

Stage 2 assessment of parcels	Potential harm caused by release of parcel
Makes a STRONG contribution to one or more GB purposes.	High

Other Comments

1. The Rossendale Hospital Site has been redeveloped and it should now be taken out of the Green Belt – its retention in the Green Belt does not meet the five purposes of the Green Belt. The Policies Map should be updated to reflect this development as it presently shows the now demolished Rossendale Hospital and is therefore out of date.
2. The land to the south west of parcel HS2.62 marked ‘IWS’ on the Policies Map should be allocated as a Recreational Area within the Green Belt.

I would welcome the opportunity to discuss these comments in more detail should this assist. I can be contacted on

Yours sincerely,

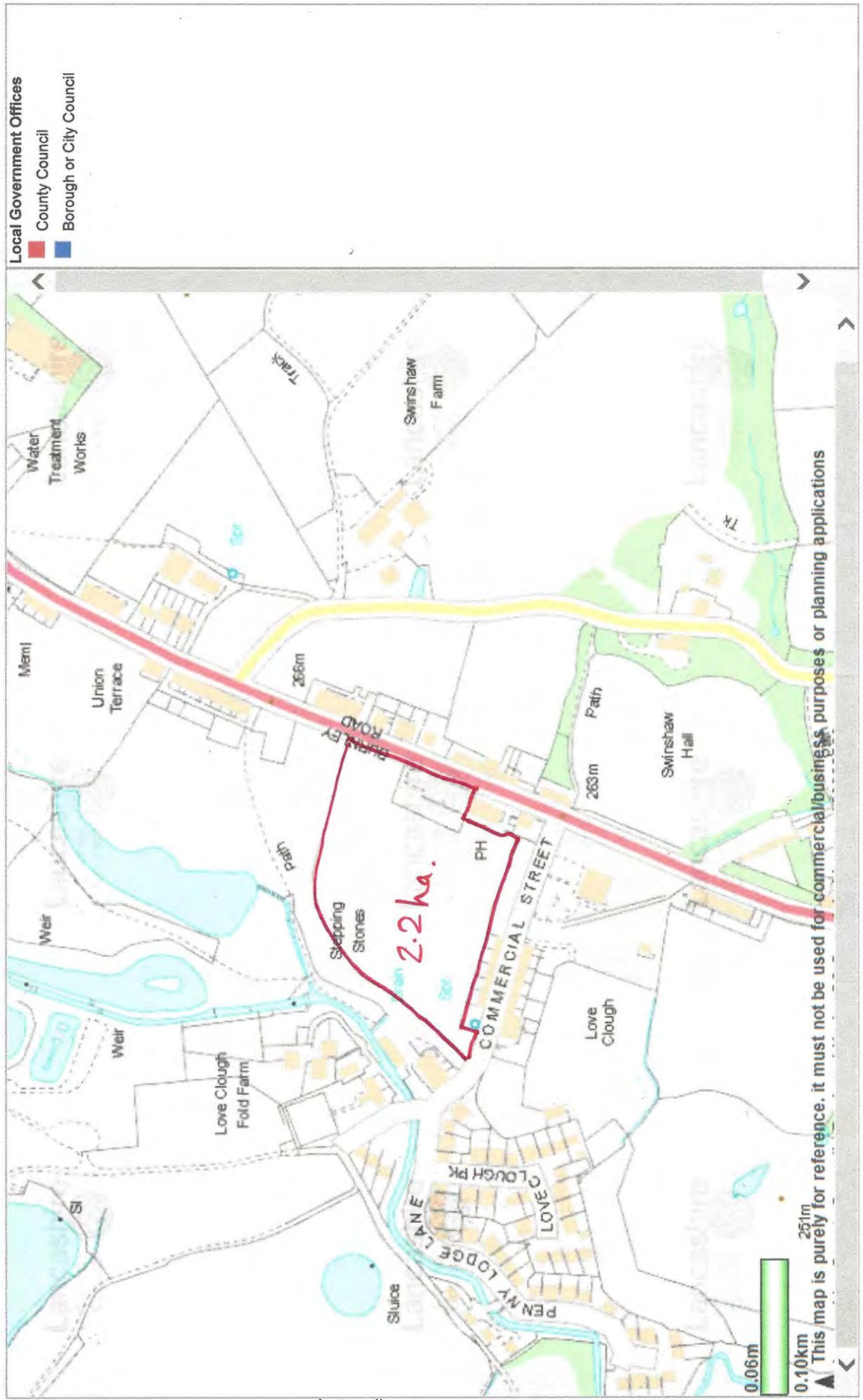
Appendix 1 - Release of Land from the Green Belt at Lower Fold Head Farm, Whitworth



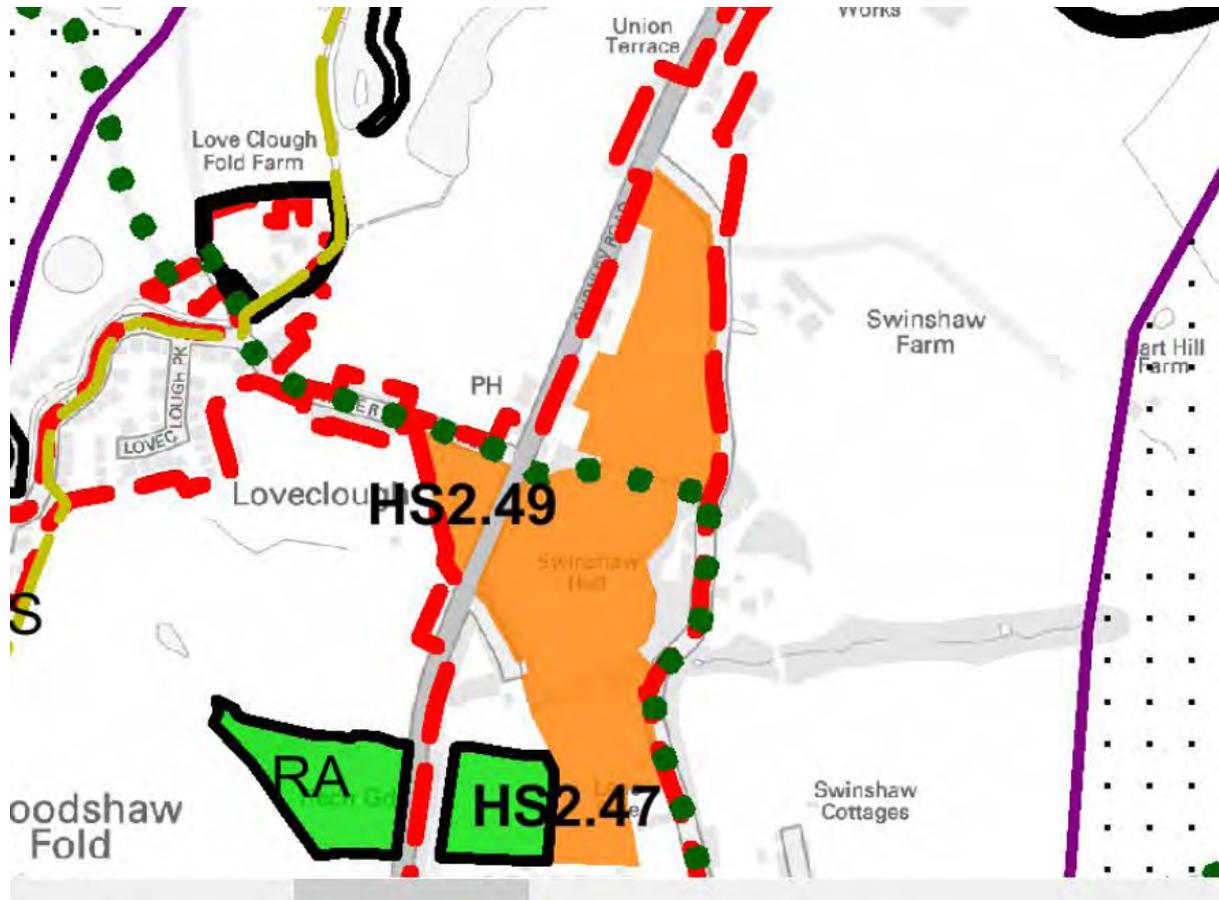




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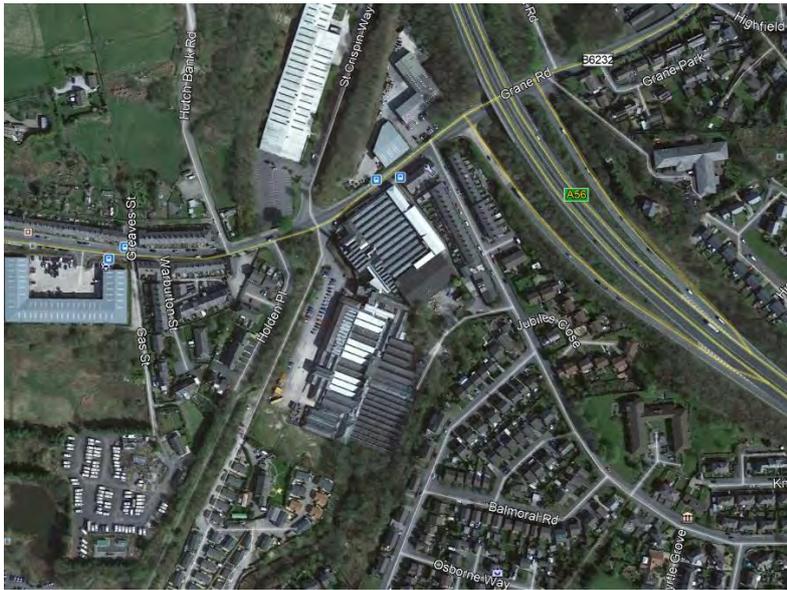
Extract from local plan proposals



**REPRESENTATIONS TO
LOCAL PLAN**

**GRANE ROAD MILL -
LAND SOUTH OF GRANE
ROAD,**

OCTOBER 2017



1. INTRODUCTION

- 1.1. Eden Planning is submitting representations on behalf of Blackmores D Ltd.
- 1.2. The site the representations relate to is referred to as Grane Road Mill. The property lies to the south of Grane Road and is separated from the larger employment area of Carrs Industrial Estate (EMP 37 within the Rossendale Employment Land Review – 2017).
- 1.3. The site measures approximately 3.3 Ha and lies adjacent to residential properties fronting Jubilee Road and Grane Road.



2. CONTEXT

- 2.1. Grane Road Mill lies to the south of Grane Road, physically and operationally separate from the adjacent Carrs Industrial Estate. The site is typical of an old industrial site, which has evolved over time in an ad hoc way.
- 2.2. The site comprises a range of small spaces. Most of the buildings have low ceilings and poor/limited vehicular (access and no vehicular access between buildings. The buildings cannot easily be subdivided into smaller lets and due to the physical conditions.
- 2.3. A further constraint is proximity to residential properties, as occupiers are concerned about restrictions to operations.
- 2.4. In short, the site is not suited to modern industrial occupier requirements and demand for employment use is poor.
- 2.5. Industrial agents (LM6) have provided initial advice, and confirmed that demand for the mill for continued industrial use is likely to be low, with occupiers preferring more modern industrial units well connected to the motorway network.
- 2.6. Looking forward, the buildings need major maintenance and upgrades, with a number of abnormal costs, including asbestos roofs and at this stage the needed work are not viable. Redevelopment for employment use is further restricted by the cost associated with accommodating the stream that runs beneath the site.

3. PROPOSED ALLOCATION AND ASSOCIATED POLICIES EMP2 AND EMP3

- 3.1. Within the emerging Local Plan the site forms part of allocation EMP 2.19 and is proposed to be retained as an Employment Site with Policy EMP2 applying.
- 3.2. The background document informing this allocation, the Employment Land Review 2017, considers the site as part of the wider Carrs Industrial Estate (EMP38). We disagree with the assessment and believe, due to the physical separation that Grane Road Mill should be assessed as a separate allocation.
- 3.3. We have provided a revised assessment below which we consider more accurately reflects the subject site.

	Road Access	Local Accessibility	Proximity to Urban Areas/services	Compatibility to adjoining uses	Development and Env Constraints	Market attractiveness	Overall Rating
EMP38	VGood	VGood	VGood	Average	Good	Good	Good
Grane Road Mill	Good	VGood	VGood	VPoor	VPoor	VPoor	Poor

- 3.4. Furthermore, the Page 31 of the emerging Local Plan notes that much of the employment committed supply is of *poor quality and unable to meet the needs of modern businesses*, nor located where market demand is greatest. Hence there is a qualitative as well as a quantitative need to identify new land for employment.

- 3.5. This reinforces our own assessment, that whilst there is a lot of buildings/sites in employment use, these rarely meet modern occupier requirements, and land should be allocated in alternative locations to meet the needs and support the economic growth of the Borough. The focus should be shifted to allocate larger Green Field sites for employment uses, allowing existing employing sites, that are constrained to come forward for alternative uses.
- 3.6. Furthermore, the need for employment land must be balanced against the demand for land for housing. It is noted that within the emerging Local Plan, reference is made (page 12) to the need to release land from the Green Belt to meet housing needs. It is therefore essential, to make best use of brownfield land opportunities.
- 3.7. In this regard, EMP 3 is too restrictive, and could result in the delay of bringing sites that are suitable for housing or alternative needs. This does not accord with the objectives of the NPPF which states clearly that planning should not be a barrier to economic growth or meeting housing needs. It could also be interpreted in a number of ways, ie many of the criteria are subjective. Whilst greater clarity will come forward in the SPD we raise concerns that the policy as drafted is overly restrictive and does not support the overall objective of supporting economic growth and meeting housing needs.

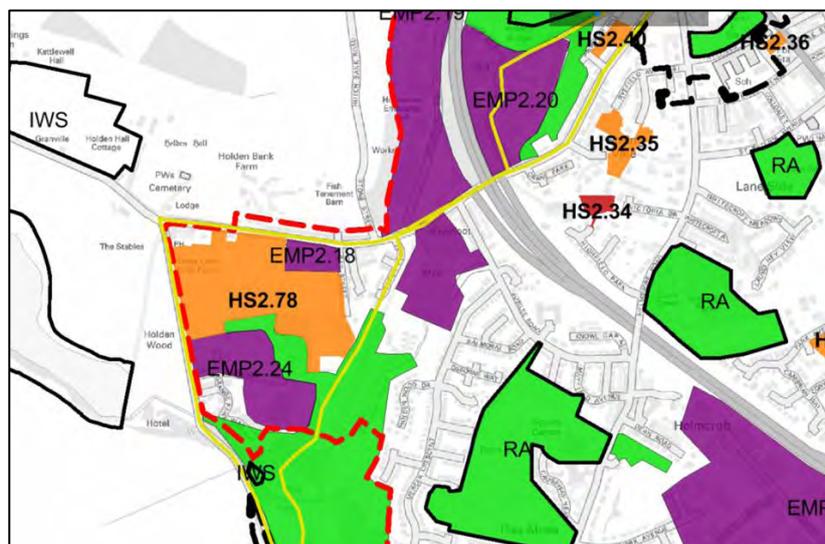
4. ALTERNATIVE SCENARIO – ASSOCIATED POLICY HS1 AND HS2

- 4.1. Should an alternative approach be taken towards the allocation of more suitable land for employment, it is likely that a larger proportion of the existing sites in employment use, that are no longer suitable for this use, could come forward for housing.
- 4.2. This would enable to Council to seek a higher target than 20% of new housing to be provided on Previously Developed Sites, and we suggest that Policy HS1 should be amended accordingly.
- 4.3. We note that the target is for a minimum of 4,000 dwellings over the plan period and that the SHLAA only identified land for c 3,600.
- 4.4. We are specifically asking that the Grane Road Mill be added as a housing allocation. As acknowledged in the assessment provide in Section 3 above (and the ELR), the site is very accessible. The site is surrounded by existing residential properties and is close/adjacent to proposed location HS2.78 – Land off Holcombe Road. The principle of housing in this location is already considered acceptable.
- 4.5. Measuring c3.3 ha, using the Councils calculation of 30 dph, the site has potential to provide around 100 dwellings.
- 4.6. Furthermore, the redevelopment of the site for housing, removes an existing land use conflict and could deliver many amenity and environmental benefits, opening up the culverted river, of a prominent site.

5. SUMMARY

5.1. In summary, we are requesting:

- Allocation EMP 2.19 be revised to remove the Grane Road Mill
- Grane Road Mill should be reallocated as a housing site under Policy HS2.
- Policy HS2 should be amended to seek a higher proportion of housing to be provided on Previously Development Sites.
- Policy HS3 should be revisited, as in its current form it does not provide clarity or certainty for land owners or developers, and could result in planning being a barrier to economic growth and delivery of housing.



5.2. These representations have been prepared in haste to meet the deadline. The developer is committed to bring the site forward for redevelopment and can provide additional information to support the submission including details of ownership and control, indicative layout plans and technical reports.





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