APPENDIX 4

Information received to support comments on the Rossendale Draft Local Plan

(Regulation 18 Consultation)

Individual Reference Number

1764



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 is organised numerically by the individual reference number for each person. Confidential information including personal addresses, signatures, contact details etc. have been removed.

Individual	Name	Policy or Site	Type of Policy or	Site Name (if	Appendix	Page
Reference		Reference	Site	applicable)	Number	No.
1764	Graham lamb on behalf of Taylor Wimpey	Site HS2.71	Housing Site	Land West of Market Street, Edenfield	4	853



ROSSENDALE DRAFT LOCAL PLAN REGULATION 18 CONSULTATION (JULY 2017)

REPRESENTATION BY TAYLOR WIMPEY (UK) LTD

LAND WEST OF MARKET STREET, EDENFIELD

Date: 09 October 2017

Pegasus Reference: GL/MAN.0299/R002v1

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CONTENTS

1.	INTRODUCTION	. 2
2.	STRATEGIC AND DEVELOPMENT CONTROL POLICIES	. 3
3.	LAND WEST OF MARKET STREET, EDENFIELD (ALLOCATION HS2.71)	14
4.	CONCLUSION	18

APPENDIX 1 – MARKET STREET EDENFIELD DEVELOPMENT STATEMENT APPENDIX 2 – LANDOWNER MEMORANDUM OF UNDERSTANDING APPENDIX 3 – OPPORTUNITIES AND CONSTRAINTS PLAN APPENDIX 4 – RANDALL THORP LANDSCAPE REBUTTAL – EDENFIELD



1. INTRODUCTION

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representations to the Rossendale Draft Local Plan Consultation, which ran between 24th July and 9th October 2017.

Taylor Wimpey's Land Interests

- 1.2 Taylor Wimpey are pursuing various interests within the Rossendale Local Authority Area and have made separate site specific representations on the following sites:
 - Land West of Market Street (Draft Allocation HS2.71)
 - Land at Grane Road, Haslingden (Draft Allocation HS2.78)
- 1.3 Accordingly, this document provides general comments on the consultation and supporting evidence base involving the land to the west of Market Street, Edenfield.

Representation Structure

- 1.4 The structure of these representations takes the following form:
 - In Section 2 we provide general comments on the various strategic and development control policies (which are largely duplicated across both representations, with some site specific references).
 - In Section 3 we make site specific comments on Market Street, Edenfield, which is divided into 3 subsections:
 - *i.* Response to the requirements of Policy HS3: Edenfield
 - *ii.* Assessment of the evidence base documents concerning Market Street, Edenfield
 - iii. Conclusions on Market Street, Edenfield
 - In Section 4 we provide our overall conclusions on the draft plan and allocation of the Market Street, Edenfield site.



2. STRATEGIC AND DEVELOPMENT CONTROL POLICIES

2.1 This section comments on the strategic and development control policies in the Draft Plan, how the allocation of the Market Street, Edenfield site for residential purposes upholds their objectives, and justifies the requested amendments where necessary.

Policy SD2: Urban Boundary and Green Belt

- 2.2 As we understand it, this policy confirms that the Green Belt boundaries will need to be amended to accommodate the Borough's development needs. We fully support this assertion, as it reflects the Council's evidence base, which demonstrates that the authority area is highly constrained, by topography, ground conditions and other issues, meaning that there is insufficient suitable and viable non-Green Belt land to meet the borough's needs in full. This has also been acknowledged in the text supporting Policy HS2.
- 2.3 However, paragraph 83 of the NPPF confirms that Green Belt boundaries should only be altered in 'exceptional circumstances', which have not been established or even mentioned within polices SD2 or HS2 as currently drafted; whilst the recent Housing White Paper suggested further amendments to this guidance in terms of justifying Green Belt release (paragraph 1.39).
- 2.4 In our view, it is the combination of increased housing need (both market and affordable) and insufficient supply, and the harm that will occur from failing to meet these needs; in terms of slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice; that generates the exceptional circumstances for Green Belt release in Rossendale, and we would ask that the policy text is updated on this basis.

Policy HS1: Meeting Rossendale's Housing Requirement

2.5 This policy outlines that 4,000 dwellings will be required over the plan period (2019-2034), which equates to 265 dwellings per annum (dpa), and represents a slight increase from the 247 dpa set out in the previous Core Strategy which was based on the RSS.

Strategic Housing Market Assessment (SHMA) December 2016

- 2.6 This figure comes from the SHMA which was produced in December 2016 by Lichfields, and suggested that Rossendale's objectively assessed housing need (OAN) is 265-335 dpa.
- 2.7 Whilst we do not dispute the SHMA's findings, and accept that the proposed target represents an increase from the adopted Core Strategy, we have concerns with the Council's adopting a figure at the lower end of the range.
- 2.8 Firstly, we note that the 265 dpa figure represents the demographic baseline with uplifts for market signals and affordable housing; however it does not take account of economic aspirations, as employment-led needs suggested a range of 269-335 dpa. Yet the NPPF is clear that housing strategies within Local Plans must take account of economic aspirations (paragraph 158), whilst



the NPPG (paragraph 2a-018-20140306) notes how failing to align housing and jobs "could result in unsustainable commuting patterns... and reduce the resilience of local businesses".

2.9 Secondly, adopting a figure at the lower end of the OAN range provides no flexibility to take account of potential unmet needs of adjacent authorities, and whilst we accept that Rossendale is **considered to be its own Housing Market Area for the purposes of the SHMA, it's level of** containment is actually lower than the 70% threshold set out in the NPPG and it is directly adjacent to Greater Manchester, where a new Spatial Framework (GMSF) is being prepared across the 10 authorities which will necessitate substantial housing growth. Indeed the SHMA acknowledges that Rossendale has strong commuting flows with Manchester, and significant housing market overlap with both Bury and Rochdale, with paragraph 13.3 noting:

"Through the Duty to Co-operate process RBC must consider the housing issues of adjoining authorities, particularly Bury and Rochdale, and assess any additional need required to be met. The target requirement is for Rossendale to judge based on the evidence provided to them."

- 2.10 In light of this, it is pertinent that neither Manchester or Bury are currently able to demonstrate a 5-year supply, whilst Rochdale claim between 5.1 6.1 years, suggesting existing issues in respect of housing capacity.
- 2.11 Moving onto the GMSF itself, the December 2016 draft set a housing target of 227,000 from 2015-2035 and proposed significant Green Belt across 55 large strategic allocations, totalling close to 70,000 units; although this still left over 157,000 units to be met by each individual authority.
- 2.12 However since then, the new Metropolitan Mayor, Andy Burnham has called for the plan to be redrafted to minimise Green Belt release and therefore it looks likely that the 10 GM authorities will be looking for even greater numbers within their urban areas. This will generate huge delivery challenges in these areas and unless the Mayor's position changes, this is likely to generate unmet need, which will need to be accommodated by the surrounding authorities, unless they can demonstrate and evidence that this is not achievable.
- 2.13 As such we would recommend an uplift to take account of employment needs, and to provide some flexibility to accommodate any unmet needs from surrounding GM authorities. Adopting a higher figure, which goes above and beyond meeting just **Rossendale's** basic need, would align with paragraph 154 of the NPPF which states that Local Plans should be aspirational, as well as realistic.
- 2.14 Furthermore, paragraph 47 of the NPPF requires local authorities 'to boost significantly' the supply of housing. Adopting a housing requirement which utilises a higher figure within the OAN range would therefore obviously assist in achieving this overall goal, and would provide a more aspirational figure to drive growth in Rossendale.



Consultation on Standard Housing Need Methodology- 14th September 2017

- 2.15 Following the publication of the SHMA and Draft Local Plan, the government have issued a consultation paper proposing a new standardised approach to calculating housing need. At the outset, it must be noted that this is only a consultation document at this stage and cannot be afforded any meaningful weight at the present time. It is likely to generate a significant number of responses and objections, given it is such a fundamental element of the planning process, and therefore it is entirely possible that it will be subject to change before it makes its way into formally issued policy.
- 2.16 In Rossendale's case, the proposed methodology generates a housing need of 212 dpa from 2016-2026; which is below the OAN range suggested in the December 2016 SHMA (269-335 dpa). However, there are a number of flaws/implications that result from the Government's drafted approach, which we have identified.
- 2.17 Firstly, the suggested calculation of objectively assessed housing need is simply based on anticipated demographic change and uplifts associated with affordability market signals. It does not automatically include the need to take account of economic considerations.
- 2.18 Helpfully, the consultation does note that authorities will be able to plan for higher housing numbers to support a strategic infrastructure project, or increased employment ambitions (giving examples of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or **a modern Industrial Strategy). In short, economic considerations effectively become a 'policy on'** decision rather than a direct input in terms of calculating what the OAN will be.
- 2.19 The critical point to note is that the revised housing OAN methodology does not obviate a Local Planning Authority from promoting a sound Development Plan, which needs to be positively prepared, justified, effective and consistent with national policy.
- 2.20 Importantly, there is no proposed change to the relevant Acts which require a Development Plan to embody the principles of 'sustainable development' and there is no proposed change to the definition of sustainable development, which embodies economic, social and environmental considerations, as set out in the NPPF.
- 2.21 Indeed, the NPPF will continue to state that "*local planning authorities should positively seek opportunities to meet the development needs of their area*", as required by paragraph 14. Given such needs include economic development as well as housing development, it is difficult to see how the two considerations can be meaningfully separated when preparing a holistic, sound Development Plan and one that fully adheres to the principles of delivering the "*presumption in favour of sustainable development*".
- 2.22 Furthermore, this methodology only covers the period 2016-2026, whilst most emerging or adopted Local Plans cover a 15-20 year period, with Rossendale's running from 2019-2034, and therefore the current figures cover less than half the plan period.



- 2.23 In short, the revised OAN methodology will still only continue to represent the starting point in forging a sound Local Plan.
- 2.24 The SHMA has already confirmed that a minimum of 269 dpa would be required to support their job growth aspirations and align with the NPPF requirement. Furthermore, affordable housing need is real issue in Rossendale with the 2016 SHMA (paragraph 13.19) confirming a need of between 158-321 dpa, which would also justify an uplift, whether as part of the OAN calculation as it is now, or as a 'policy on' adjustment if this new methodology is adopted.
- 2.25 There are also other economic objectives within Rossendale that will be aided by an uplift in housing. Much of the borough currently suffers from low property values, with more than half of **the Borough's properties** (51%) falling in Council Tax band A, well above the Lancashire County average of 37% and more than double the average for England of 25%.
- 2.26 Providing additional housing beyond the minimum demographic need, and particularly greenfield and Green Belt development, which promotes lower density, higher value, large family housing, will help to raise this profile and secure higher Council Tax bandings and receipts which can then be reinvested in local services, which have been subject to significant cuts in recent years. This additional choice and variety of housing will also help to inject more dynamism and mobility at all levels of the local housing market.
- 2.27 Penultimately, the consultation proposes that Local Authorities agree Statements of Common Ground with neighbouring authorities on areas of cross-boundary housing need and other strategic matters. Given the issues raised above in terms of supply pressures within Greater Manchester, and particularly the adjacent authorities of Bury and Rochdale where there this significant housing market overlap; this would again support Rossendale building some flexibility into their housing requirement to accommodate unmet need as part of this SoCG/ duty to cooperate process.
- 2.28 Finally, a criticism we will be raising in relation to the government's revised OAN approach is that it effectively restarts the clock on housing need, without looking at what backlog or concealed households have been generated in years gone by due to the lack of delivery.
- 2.29 In the case of Rossendale, the Borough has been without a full Local Plan (i.e. one that specifically allocates housing sites to direct the development industry in where it should seek to develop) for a considerable period of time. Indeed, the Core Strategy was adopted in 2011, prior to the NPPF. It does not allocate housing sites. Furthermore, the previous Local Plan dates back to 1995 and its Proposal's Map is still being relied upon for settlement boundaries. Whilst we note there are other issues within Rossendale (such as the topography), combined with the lack of a full and directional Local Plan, this has seriously restricted housing delivery across the Borough for over of 20 years.
- 2.30 To continue to delay the delivery of the Local Plan will only continue to compound affordability issues in certain parts of the Borough, which could ironically push the Council's housing requirement up further overtime. For the above reasons, we consider the Council should press on with the



submission of the Local Plan but should consider an increase in the housing requirement to take account of economic needs, to address structural issues in the housing market, and to provide flexibility to accommodate unmet needs of adjacent authorities if required in the future.

Policy HS2: Housing Site Allocations

- 2.31 Taylor Wimpey wholly support the allocation of the Land West of Market Street, Edenfield (HS2.71) for residential development, and we discuss this site, and its delivery assumptions in more detail in Sections 3 of these representations
- 2.32 We would also reiterate our comments on policy SD2 in that we support the Council's acceptance that Green Belt release is necessary, but that the Plan needs to clearly articulate the exceptional circumstances that support the amendment of their Green Belt boundaries.
- 2.33 Looking at the allocations themselves, there are 109 in total, with an expected capacity of 3,622 dwellings based on a standard density 30 dph; which falls short of meeting the proposed housing requirement of 4,000 dwellings in full.
- 2.34 The supporting text does state that sites with extant consent and those nearing completion have not been included with reference to the Council's 5-Year Housing Land Supply Report (2017-2022). This document suggests an existing deliverable supply of 985; however it should be noted that this covers the period 2017-2022, whilst the plan covers the period 2019-2034, and when you consider the 5 year trajectory only 174 of the 985 dwellings are to be delivered from 2019 onwards, with the numbers set out below (2019 onwards in brackets):
 - Dwellings under construction: 436 (48)
 - Dwellings with planning permission: 261 (54)
 - Dwellings with resolution to grant permission: 256 (40)
 - Small sites allowance: 32 (32)
 - Deliverable Capacity: 985 (174)
- 2.35 This generates an overall capacity of 3,796 and suggest that Council's proposed allocations and existing supply will not meet its basic housing requirement to 2034, and this shortfall would be even greater if the housing requirement is increased as we advocate above.
- 2.36 We would ask that the Council provide clarification on this matter, particularly the relationship between the allocation figure in the consultation document and the 5 year supply figures, given the differing time periods; as this is not explained within the Draft Plan.
- 2.37 If our calculations are correct, then clearly the Council will need to allocate additional sites to meet its basic requirements, which we consider should be increased anyway.



- 2.38 Furthermore, the NPPF is categoric that housing requirement is a minimum figure which Local Plans should seek to surpass, and this interpretation has been endorsed in numerous Local Plan examinations. Exceeding the basic requirement also generates a buffer in the supply and provides flexibility within the plan to take account of under-delivery and additional choice in the market.
- 2.39 A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Such an approach is recommended within the LPEG report to Government (dated March 2016), with recommendation 40 (at Appendix A) noting that Local Plans should:

'focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF. Reserve Sites represent land that can be brought forward to respond to changes in circumstances."

2.40 As such the Council should consider allocating additional sites over and above its housing requirement. Based on the **Council's** current requirement a 20% uplift would require allocations for up to 4,800 dwellings, and based on our findings above this would require land for approximately 1,000 additional dwellings to be identified.

5 Year Supply

- 2.41 **Moving on to the Council's 5**-Year Housing Land Supply Report (2017-2022) we note that this confirms that Rossendale are currently unable to demonstrate a 5 year supply, and claim between 2.4 and 2.6 years depending which scenario is used.
- 2.42 This is a clear indication that there are a lack of deliverable housing sites in the borough and that the Council could be vulnerable to speculative development proposals through S78 appeals until they get a robust plan in place.
- 2.43 Whilst we welcome the Council's acknowledgement of this issue and the detailed trajectories included in this document we do raise the following issues with the methodology:
 - The Council add the 20% buffer before adding the shortfall; however the approach adopted by Pegasus Group is to apply the NPPF buffer to the requirement and backlog combined, and this has been endorsed in several appeals, including the Droitwich Spa decision (Refs: APP/H1840/A/13/2199085 & APP/H1840/A/13/2199426).
 - The Council have not applied any discounts to their claimed supply to allow for underdelivery; yet a 10% lapse rate is generally advocated by S78 Inspectors (see Droitwich Spa decisions above), and would be appropriate here given Rossendale's physical constraints and historic under delivery.
- If the above adjustments are made in the methodology this gives a 5 year supply figure of between2.11 and 2.33 years:

Council's 5 Year Supply Dor

	2017-2022		New	
	Scenario 1	Scenario 2	Scenario 3	Method
Annual rate	247	Variable	265	212
5 year rate	1,235	1,335	1,325	1,060
Shortfall against Core Strategy target/ CS trajectory (variable)	425	249	425	425
Shortfall then buffer (Correct)	1,992	1,901	2,100	1,782
Buffer then shortfall (Rossendale)	1,907	1,851	2,015	1,697
Claimed supply	985			
10% lapse rate	886.5			
5 year supply (Correct)	2.23	2.33	2.11	2.49
5 year supply (Rossendale)	2.32	2.39	2.20	2.61

Figure 2.1 – Rossendale's 5 Year Housing Land Supply

2.45 Finally, we note that if the Government's draft/proposed standard housing needs methodology were applied in Rossendale, it would still only result in a 2.49 year supply (or 2.76 years with no lapse rate deductions). In short there are acute supply issues in the area that should be addressed at the earliest opportunity.

Policy HS3: Edenfield

2.46 Addressed in section 3 below.

Policy HS4: Affordable Housing

- 2.47 Taylor Wimpey fully support the need to deliver affordable housing, and agree that policies of this nature should be set within a Local Plan or other statutory planning policy. Taylor Wimpey also recognise their obligations as a responsible housebuilder to assist in meeting such needs.
- 2.48 As noted above the SHMA confirms that there is acute affordable need in Rossendale, ranging from 158-321 dpa, which equates to between 60% and 121% of the Council's chosen housing requirement. Meeting this need in full is unlikely to be realistic as this must balance against the impacts that the policy requirement has upon the viability of development. As such, we welcome the Council's flexible approach in HS4 part a, in applying a 30% requirement for market housing schemes 'subject to site and development considerations (such as financial viability)'.
- 2.49 We also welcome the requirement in part c that the tenure, size and type of affordable provision be based on the *'latest available information on housing needs'* rather than any prescriptive requirement. This allows the plan to be more flexible and individual schemes to respond to more localised needs at the time they are being considered. That said, we reserve the right to make further comments on future local needs assessments.
- 2.50 In respect of part d, we note that some schemes may lend themselves, or specific Registered Providers may prefer, to locate the affordable housing in a specific part of the site for practical purposes (i.e. maintenance) or for other site-specific reasons (proximity to public transport routes



etc.), and therefore we would ask that some flexibility is built in, such as adding the wording "*should be evenly distributed throughout the development, where practical*".

2.51 Finally, we welcome the acceptance that both on and off-site provision of equivalent value will be considered.

Policy HS5: Housing Density

2.52 We agree with Policy HS5 as drafted, as it allows for sufficient flexibility and variation in density, based on the characteristics of the individual site; rather than a blanket prescriptive requirement.

Policy HS6: Housing Standards

2.53 Policy HS6 indicates that the Council intend to introduce accessibility standards (at least 30% of housing to be wheelchair adaptable) and national internal space standards and we comment on these in turn.

a) Access- meeting the needs of elderly or disabled residents

- 2.54 Whilst Taylor Wimpey are committed as a responsible house builder to deliver accessible forms of housing if required, this must be based on a demonstrable need, and therefore we would request that evidence and clarification is provided on this matter.
- 2.55 Part A requires at least 30% of any new housing development to meet the needs of elderly or disabled residents, or be easily adaptable; subject to site-specific factors and viability.
- 2.56 Whilst we welcome the flexibility provided within this policy, and would highlight that site specific factors such as topography are a major issue in Rossendale, we do raise concerns with the 30% starting point.
- 2.57 The explanatory text to this policy indicates that the SHMA highlights a considerable growth in the number of elderly households, as well as a high percentage of households containing one or more adults with some form of disability.
- 2.58 This reflects the aging population trend which can be seen nation-wide. Paragraph 10.74 of the SHMA also confirms that 18.5% of households in Rossendale contain one or more adults with some form of disability. However, whilst the SHMA provides a starting point in establishing demographic trends, it does not provide enough evidence to translate this into a policy threshold for housing to be adapted to these specific groups and certainly not one set at 30%.
- 2.59 Firstly, neither the SHMA nor wider evidence base confirms the proportion of these groups who will require dedicated, and wheelchair adaptable new housing, as many may wish to stay put and adapt their own homes. Furthermore, whilst the Viability Assessment states that it has factored these requirements in, these are insufficiently evidenced and justified in the report, which gives no detailed breakdown of the costs involved.



2.60 It is worth reiterating Section 56 of the NPPG, which confirms that the introduction of new enhanced standards on water efficiency, accessibility and spaces are optional, and must be justified by specific evidence on need and viability before they can be implemented. The evidence in this instance falls well short of demonstrating the need or viability of a 30% target.

b) Internal Space- National space standards

- 2.61 As with the elderly housing requirement, we have concerns with the application of the National Space Standards on the basis that the need and viability for this has not been sufficiently demonstrated within the evidence to meet the requirements of the NPPG (paragraph 56-020-20150327). The SHMA does not consider housing size in this context, and whilst the Viability Assessment states that it has factored these standards in, the implications are not properly articulated.
- 2.62 In respect of the space standards, the NPPG also requires that transitional arrangements are considered following adoption to enable developers to factor the associated costs into future land acquisitions, and there has been no discussion of this in the Draft Plan or evidence.
- 2.63 As such we would request that this requirement is removed or that additional evidence and clarification is provided.

Policy HS8: Open Space Requirements in New Housing Developments

2.64 This Policy confirms that the existing SPD on Open Space will be updated to discuss minimum local standards and appropriate financial contributions. We therefore reserve the right to comment on these local standards and financial contributions as and when the SPD is updated and consulted on.

Policy HS9: Playing Pitch Requirements in New Housing Developments

2.65 Again, it is stated that an accompanying SPD will be produced to establish minimum local standards and appropriate financial contributions from new residential development. We reserve the right to comment on this matter further as and when the SPD is produced and consulted on.

Policy HS18: Self Build and Custom Built Homes

- 2.66 Taylor Wimpey welcome the Council's identification of suitable land to accommodate self-build and custom built houses. Indeed, seven housing allocations have been identified specifically for this type of housing and we fully agree with this approach.
- 2.67 In light of this, we are unsure why the policy then also requires developers to make at least 10% of plots available for sale for self/custom build. Whilst this policy suggests that this will be encouraged as opposed to required, it is considered that the appropriate mechanism to deliver self-build and custom-built homes is through specific allocations, as proposed here, rather than a prescriptive requirement for each and every allocated site in the Local Plan.



- 2.68 Requiring private developers to provide service plots available for sale within every housing scheme will place and unnecessary constraints and burdens on those housebuilders, and could potentially lead to delays in delivery while those plots are being marketed; particularly where there may be little market demand. Indeed, the explanatory text to Policy HS18 explains that evidence from the SHMA indicates that the level of demand for self-build plots is currently low in Rossendale.
- 2.69 As such we would request that the allocations remain, but the 10% requirement be removed. Then through preparation of a self-build and custom build housing register, the Council can continue to effectively monitor demand for self-build and custom homes through the process and identify additional sites for this purpose if necessary.

Policy ENV1: High Quality Development in the Borough

- 2.70 We support the general principles outlined in Policy ENV1, which are all important factors in delivering high quality development in the Borough.
- 2.71 Whilst acknowledging the important role that Development Briefs or Design Codes (point m) can play in delivering high quality development, they can sometimes add an additional administrative burden leading to delays to housing delivery. In order to overcome this, if Design Codes or Development Briefs are to be introduced, this process should involve early engagement with Developers on Masterplan concepts. Frontloading such work will save delays down the line, and provide a high quality design framework which both the Council and Developer are happy with. It should be noted, that Taylor Wimpey have already undertaken such engagement with the Council on the development proposals for the Market Street, Edenfield site.
- 2.72 Additionally, Design Codes can sometimes impose constraints on the sale of land to specific housebuilders, if certain standards are outlined which not every housebuilder could deliver. This is something that should be considered as part of dialogue between the Council and developers/landowners for each individual site.
- 2.73 The above points should be seriously considered given the Council is unable to currently demonstrate a 5-year supply of housing and will be under pressure to have this requirement secured upon adoption of the Plan. Necessitating Development Briefs or Design Codes for each allocated site will simply push back delivery rates.

Policy ENV3: Local List

2.74 We have no comments on this policy other than to request that the list is well publicised, in order for interested parties to monitor listed sites that affect them. We would also request that the methodology selection criteria for including sites are made clear.



Policy ENV4: Landscape Character and Quality and Policy ENV5: Biodiversity, Geodiversity and Ecological Networks

2.75 We support the wording of these policies, which is sufficiently flexible and in line with the provisions of the NPPF.

Policy TR1: Strategic Transport

2.76 Taylor Wimpey welcome the focus on developing the potential of the East Lancashire Railway for both transport and tourism purposes, as this would introduce a further sustainable transport mode into the area, and reduce the reliance on the private car for commuting purposes.

Policy TR4: Parking

2.77 This policy requires compliance with the parking standards set out in Appendix 1. However, Appendix 1 sets out maximum standards (with some exceptions) which are no longer supported by government policy following the written ministerial statement, entitled 'Planning Update March 2015', which states that:

> "Local planning authorities should only impose local parking standards for residential and nonresidential development where there is clear and compelling justification that it is necessary to manage their local road network."

2.78 Therefore, unless such justification is provided it is recommended that the maximum standards provided in Appendix 1 should be deleted.

Conclusions on Strategic and Development Control Policies

2.79 Overall, Taylor Wimpey are supportive of the Draft Plan, subject to the comments and suggestions above.



3. LAND WEST OF MARKET STREET, EDENFIELD (ALLOCATION HS2.71)

- 3.1 Taylor Wimpey are the legal owner of a 12.5 Ha Green Belt site west of Market Street, Edenfield.
- 3.2 The site was submitted to the Council's call for sites process in June 2016 and this was followed with the submission of a Development Statement in September 2016, which is attached at Appendix 1.
- 3.3 The site (SHLAA Ref: 16202) is now proposed as part of large housing allocation Site HS2.71 which covers 26 hectares of land across four individual sites. The combined allocation has an indicative capacity of 451 which accounts for 12.5% (or 1/8) of all the allocations in the Borough, indicating its importance to the delivery of the plan. This is also reflected in Policy HS3, which we address on the next page.
- 3.4 It must also be noted that this allocation will be important for the delivery of the type of aspirational family housing in Rossendale which is currently lacking, and this will serve to improve its Council Tax profile and increase receipts.
- 3.5 The attached Development Statement and evidence submitted to date have demonstrated that this is a sustainable and deliverable site in accordance with the NPPF, which is capable of delivering up to 273 units, commencing within the next 5 years. Indeed, Taylor Wimpey own the site outright and therefore there will be no delay in converting the land sale. This will allow the development arm of the business to promote a full application as soon as practically possible post adoption of the Local Plan and its removal from the Green Belt, assuming a separate master planning process, SPD or Design Code is inserted into the site allocation policy.
- 3.6 We do not dispute the Council's assessment in Table 1; albeit it is suggested that the site area is corrected, as the Taylor Wimpey land measures 12.5 Ha not 9.12 Ha.

Response to the Requirements of Policy HS3: Edenfield

3.7 Policy HS3 is a policy supporting the HS2.71 allocation at Edenfield, which covers 26 hectares of land across four individual sites, being promoted by four separate parties. The Taylor Wimpey site covers the largest site area, at the centre of the allocation. Policy HS3 states that new residential development will be permitted in this area subject to specific criteria and we address these in turn below.

a) Comprehensive development of the entire site is demonstrated through a masterplan

- 3.8 Policy HS3 outlines how the Council expect to see comprehensive development of the full allocation through a masterplan.
- 3.9 Taylor Wimpey are committed to this process and have engaged with the other key landowners, as demonstrated in the Memorandum of Understanding and an initial Constraints and Opportunities Plan, which are attached at Appendix 2 and 3 accordingly.



3.10 As part of this it was agreed that the next step should involve the interested parties meeting with the Council to discuss the consultation responses and feedback received at the public meetings, before working up a more formal draft masterplan.

b) The implementation of development in accordance with an agreed Design Code

- 3.11 We are in agreement with the general Design Code principles listed here, but reserve the right to make further, more detailed comments as these criteria are refined and as the masterplanning process progresses.
- 3.12 We would also reiterate our earlier comments that Design Codes and other additional policy documents can add an additional layer of complexity and lead to delays in the delivery. In this instance, we agree that some form of design framework is necessary given the size of the site, albeit it is possible this could be secured through a detailed masterplan and could be controlled through a policy in the Local Plan rather than necessitating a separate document to be prepared and adopted by the Local Authority post adoption of the Local Plan.

c) A phasing and infrastructure delivery schedule for the area

- 3.13 We do not take issue with the infrastructure requirements and phasing considerations listed here; and confirm that these will be agreed and refined with the Council and adjoining landowners as the process progresses. However, we would ask that the Council clarify what format this schedule is intended to take and how it will be monitored and implemented, as again, if it has to go through any formal approval process it could add complexity and cause delays.
- 3.14 Finally, any infrastructure requirements must be shown to be necessary and proportionate, and must take account of viability matters.

d) An agreed programme of implementation in accordance with the masterplan

3.15 We would reiterate our comments from part c above,

Evidence Base - Market Street, Edenfield.

- 3.16 We now provide comments on the evidence base documents that assess the Edenfield site including:
 - Green Belt Assessment, November 2016,
 - Lives and Landscape Assessment, July 2015,
 - Strategic Housing Land Availability Assessment (Stages 1 and 2), May 2017, and
 - Sustainability Appraisal, May 2017.



Green Belt/ Landscape Assessment

- 3.17 The Council commissioned a Green Belt Assessment (prepared by LUC in November 2016) and Landscape Assessment (prepared by Penny Bennett Landscape Architects in July 2015) as part of their evidence base for the emerging Local Plan.
- 3.18 Whilst we agree with many of the findings of these two documents, we express concern with some of the conclusions in relation to the Land West of Market Street, Edenfield.
- 3.19 Randall Thorp have provided a comprehensive rebuttal statement which provides commentary on the findings of these two reports, which can be found in Appendix 4. The Randall Thorp report should be read in conjunction with these representations, and the key findings are summarised as follows:
 - The site provides a weak contribution to Green Belt purposes 1 and 3, rather than a moderate contribution as concluded in the 2016 Green Belt Assessment.
 - The potential level of harm caused by the release of the site from the Green Belt, in accordance with the 'Framework for assessing harm' at Table 4.2 of the Assessment, should be 'low'. This differs from the findings of the Green Belt assessment which suggests 'medium'.
 - The Landscape Assessment's conclusion that the site 'is not suitable for development on landscape grounds' is incorrect. When taking into consideration the broader context of the site in landscape terms as well as proposed mitigation measures, the site is entirely acceptable in landscape terms. The Assessment should therefore conclude that the Market Street, Edenfield site is 'suitable for development with appropriate mitigation'.
- 3.20 Accordingly, this rebuttal reinforces the Council's conclusions that this is a sustainable and deliverable site with limited landscape and Green Belt landscape terms and provides further justification for its allocation within the emerging Local Plan.

Strategic Housing Land Availability Assessment - Stages 1 and 2 (May 2017)

- 3.21 The site was assessed in the SHLAA under site reference 16262. Whilst we fully agree with the overall conclusions that the site is suitable, achievable and developable in the medium to long term, we have a few comments in relation to some of the findings. The Council already consider this site a suitable housing allocation, however, in our view, the site actually performs even better in certain categories of the SHLAA as explained below:
 - Heritage Assets- whilst the site does adjoin the Grade II Listed Building of Edenfield Parish Church, the scoring of the site as red in this category does not allow for consideration of detailed design matters. Whilst it is appreciated that the remit of a SHLAA is for a highlevel assessment of constraints, further information has been provided in the form of the Development Statement which confirms that this Listed Building has been taken into consideration as part of an Illustrative Masterplan. As such, when taking into consideration



design matters and the illustrative masterplan, the site should not score red in the heritage assets section.

- Landscape Value- as noted previously we disagree with the findings of the 2015 Landscape Assessment, which have fed through to the SHLAA noting a 'high landscape impact' and therefore scores red in this regard. The Randall Thorp report (Appendix 4) explains in detail the broader landscape context and landscape mitigation measures which can be implemented on site, concluding that it is suitable for development with appropriate mitigation. In light of these findings, the site will not have a high landscape impact and should not be scored as red in this category within the SHLAA.
- 3.22 We also consider that the site should have been scored higher in the ecological value and recreational value sections, which are currently amber. This relates to a more general observation that the scoring methodology and scope of the SHLAA does not allow for detailed considerations such as masterplanning and proposed design/mitigation.
- 3.23 The Illustrative Masterplan illustrates how the existing public right of way does not pose a constraint on site, on the contrary it can be well-integrated into development proposals. Additionally, the Development Statement attached at Appendix 1, which the Council are in receipt of, concludes that there are no ecological constraints preventing the development of the site and that appropriate mitigation will be provided where necessary.
- 3.24 To conclude, whilst we agree with the overall findings of the SHLAA that the site is suitable, achievable and developable, the comments above further demonstrate this. Accordingly, the evidence base fully supports the Council's decision to allocate this site for housing.

Sustainability Appraisal (May 2017)

3.25 The Council have commissioned a Sustainability Appraisal (SA) of the Rossendale Local Plan-Reasonable Alternatives report in May 2017. A general point to note is that the SA does not make it clear exactly where the sites assessed are located. There is no accompanying map and the site names do not always correlate with the descriptions in the SHLAA. It is therefore unclear and hard to establish exactly which sites are being assessed. It is therefore requested that the Council provide further clarity on this matter, which would aid in commenting further on the findings of this SA.

Conclusions on Market Street, Edenfield Site

3.26 Overall, Taylor Wimpey are wholly supportive of the Edenfield allocation and are committed to the comprehensive masterplanning process, subject to the comments and queries raised above on Policy HS3 and the evidence base.



4. CONCLUSION

- 4.1 Overall, Taylor Wimpey fully support the Edenfield allocation (HS2.71) subject to the comments and suggestions made above, which note that:
 - The overall housing requirement should be increased to take account of economic aspirations and to provide flexibility to accommodate any unmet need generated by the adjacent authorities in Greater Manchester;
 - The Council should consider allocating additional sites, both as long-term reserve sites to provide some headroom in their overall supply, and smaller short term sites to boost 5 year supply, given the current shortfalls;
- 4.2 This representation has shown that the site is deliverable and developable in line with the NPPF, and has also demonstrated its importance for housing delivery in Rossendale, representing over 7.5% of the total allocated dwelling numbers (with the wider Edenfield Allocation contributing 12.5%) and will make a significant contribution to 5-year supply.
- 4.3 Taylor Wimpey have been promoting Edenfield for a year and will continue to work alongside the Council and other respective land owners to demonstrate that it can begin delivering in the next 5 years.



APPENDIX 1 - TAYLOR WIMPEY MARKET STREET EDENFIELD DEVELOPMENT STATEMENT



Taylor Wimpey

Market St Edenfield

Development Statement

September 2016

Taylor Wimpey

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RANDALLTHORP



Figures

Figure 1: Site context plan	1
Figure 2: Aerial Photograph Showing Site Context	7
Figure 3: Site Context Plan	9
Figure 4: Rossendale Core Strategy – Green Belt Areas of Review.	16
Figure 5: Green Belt Plan	17
Figure 6: Extract from proposals map	19
Figure 7: Wider Landscape Character	23
Figure 8: Visual Context	25
Figure 9: Site Analysis Plan	31
Figure 10: Concept Plans	33
Figure 11: Illustrative Masterplan	35
Figure 12: Illustrative Hand Drawn Sketches.	37
Figure 13: Character Areas	39
Figure 14: Phasing Plan	40
Figure 15: Sustainability Plan	43

Contents

Exe	ecutive Summary	v
. 0	Introduction	2
2.0	Site and Surroundings	8
3.0	The Need for Development in the Green Belt	15
I.0	Landscape and Visual Analysis	24
5.0	Vision for the Site	30
6.0	Sustainable Development Principles	44
7.0	Deliverability	51
3.0	Conclusions	56
Abt	pendix I: Taylor Wimpey UK Limited	60
A pp	pendix 2: Site Sustainability	62

Illustrative Masterplan





Executive Summary

This Development Statement has been prepared by Taylor Wimpey UK Limited ("Taylor Wimpey") to support the release from the Green Belt of the land west of Market Street, Edenfield ("the site") to deliver approximately 240 new family and affordable homes during the next plan period. The site extends to 12.5 Ha and is located to the north west of the village of Edenfield, bounded by Market Street to the east and the A56 to the west.

The case for allocating this site for housing development as part of the emerging Rossendale Local Plan is clearly presented within this Development Statement, including the exceptional circumstances that support the need to amend the Borough's Green Belt. The allocation of this site for residential development will deliver open market and affordable housing of a type, quantity and quality that will make a significant contribution to the future growth needs of Rossendale.





1.0 Introduction



Figure 1: Site context plan



1.0 Introduction

Vision

The Market Street site presents an excellent opportunity to release 12.5 hectares of land to deliver a high quality sustainable housing site that will sensitively meet the future housing needs of the Borough. The vision for the site is to develop a landscape led masterplan that complements the surrounding site context, and creates a high quality family and affordable community to meet the needs of the Borough, whilst providing a stronger and more defensible Green Belt boundary to the west of Edenfield.

To support the vision, this Development Statement clearly articulates the opportunity presented by the site. In summary, it demonstrates that:

- There are exceptional circumstances that support an alteration to the Green Belt in the Borough; including the absence of a 5 year supply of housing land, a lack of affordable homes and insufficient urban land to meet housing need during the Plan Period.
- There is a compelling case to remove the site from the Green Belt, when tested against the National Planning Policy Framework ("NPPF"). The site represents a logical extension to north west of Edenfield which works within existing physical boundaries.
- The site has access to a range of services and facilities in the centre of Edenfield, 350m south of the site, with Ramsbottom 3 km to the south and Rawtenstall 3.5 km to the north.
- There are no identified technical or environmental constraints that would prevent the site coming forward for development.
- The site is deliverable, achievable and available for housing development in accordance with guidance contained in the NPPF.

- A vision and masterplan for the site illustrates how the site can deliver a sympathetic, sustainable development that complements its village setting.
- A sensitive design-led masterplan for the site will complement, respond to and integrate key landscape features adjacent to the site.
- The site will deliver a landscape and open space solution that relates to the existing urban grain and responds to the key natural features and topography of the site.
- The proposals for the site can deliver integrated open space that complements and strengthens links to the existing open land to the south.
- The proposals will create a range and mix of housing types that will make a positive contribution towards the Borough's housing requirements; providing both open market and affordable housing, and generating significant social and economic benefits for the local area.



The Case for Green Belt Release

The site no longer fulfils its purpose as Green Belt land as established at paragraph 80 of the NPPF and, as such, there is a compelling case for its release. Its allocation for future development would:

- Not result in the unrestricted sprawl of large built-up areas. The A56 dual carriageway forms a strong physical boundary to the west of Edenfield, and already restricts sprawl by ensuring that the urban area will not spread further west, whilst existing developments provide defensible boundaries to the north, east and south.
- 2. Not cause the merger of neighbouring towns. The immediate area is characterised by rural villages with large green gaps between them, with the nearest towns some distance away. The development of the site would not reduce the gap with the nearest settlement anyway. As such the development of this site will not cause any towns or smaller settlements to merge, and significant green gaps will be maintained around Edenfield.
- 3. Not create unacceptable encroachment into the countryside. The A56 Road already safeguards Edenfield from encroaching into the countryside, as it provides a strong physical boundary to the west, whilst the site is surrounded by development on the remaining 3 sides. As such the site serves little function as countryside.

- 4. Not impact on the special character of historic towns. There are no historic towns within the vicinity of the site and the development of the site could be sensitively designed to ensure the character of the Listed Church and wider settlement are respected.
- 5. Not discourage urban regeneration. The evidence suggests that the supply of deliverable brownfield sites is becoming exhausted and consequently, Green Belt release will be required over the life of the plan period.

There are also exceptional circumstances which support an alteration to the Green Belt. These include:

- An inability to demonstrate a five year supply of housing land.
- Insufficient land within the urban area to meet the Borough's need, due to topography and other constraints.
- An acute need for affordable housing and sites that have the capacity and viability to deliver new affordable homes.
- The delivery of a development of up to 240 high quality new homes that will deliver significant social and economic benefits in accordance with the provisions of the NPPF.

Summary

The development of the site at Market Street, Edenfield provides a highly sustainable opportunity to boost the supply of new housing in accordance with a new Local Plan for the Borough. The site will deliver the quantity, type and quality of homes that is required across the Borough and can demonstrate exceptional circumstances that support an alteration to the existing Green Belt without impacting on its core functions. Taylor Wimpey is committed to working collaboratively with the Council and Key Stakeholders to ensure that the Borough's housing need is met in a sensitive and sustainable manner.



2.0 Site & Surroundings



Figure 2: Aerial Photograph Showing Site Context


2.0 Site and Surroundings

The site is located to the north west of Edenfield, a village in the southern part of Rossendale, close to the district boundary with Bury. The site is outside the existing urban boundary, but is well contained by existing physical features, and forms a natural and logical extension to the village.

The Site

The site comprises 12.5 Ha of agricultural land which gently slopes down from the eastern boundary with Market Street to the western boundary with the A56. It is broadly triangular in shape, narrowing as it extends northwards between the two converging roads.

The central part of the site fronts directly onto Market Street, and wraps around an existing residential property, Mushroom House, which is set back from the road and accessed via a public right of way that cuts across the site, then continues along the eastern and southern boundaries. The site itself will take access through to the north of Mushroom House.

The site is characterised by open pasture land which is largely even, although there are some steeper, uneven sections to the north west. There is also some made ground in the north west corner which may have been used for landfill in the past. There is tree cover around the periphery of the site, particularly at the northern boundary and around Mushroom House, but no internal boundaries, other than a dry stone wall which lines the public right of way and separates the site into two parcels.

The site is in a sustainable location on the north west edge of Edenfield, approximately 350m north of the Neighbourhood Centre which provides local shops and facilities, and 500m south of a primary school. There are also bus stops within 220m with regular services to Accrington, Burnley, Bury and Rawtenstall.

A greater range of shops and facilities can be found in the nearby Town Centres of Rawtenstall, which is 3.5km to the north, and Ramsbottom, 3km south west.

Site Surroundings

The site is bounded by the urban area of Edenfield to the south and east, with Green Belt to the north and west. In the wider context, Edenfield adjoins the district boundary with Bury to the south and is surrounded by Green Belt on all sides, with the A56 forming a further physical boundary to the west.

The urban area is characterised by terraced stone cottages reflecting Edenfield's history as a quarry village, although there are a range of other housing types from 1930s semis to modern detached properties. The centre of village is nucleated in form with more linear development running north along Market Street.

To the immediate north of the site is a Nursing Home and a wooded area around Edenfield Parish Church.

The A56 dual carriageway forms the eastern boundary, along with part of a public right of way which crosses the road via a bridge. The road is screened by trees at the northern and southern ends, with open fields beyond.

To the south there is a Recreation Ground, which is well screened by trees, and additional open land. A public right of way also runs along the southern boundary and links with Exchange Street. Further south is the main urban area of Edenfield and the Neighbourhood Centre.

The site is bounded by Market Street to the west, and the rear of several residential properties that front it, and other uses including Pack Horse Farm. There are also residential properties on the east side of Market Street facing the site, with open Green Belt land further east.

Figure 3: Site Context Plan





Photograph 1 - View from PROW 14-3-FP 126 looking east towards Edenfield



Photograph 2 - View from the site looking east towards housing on Alderwood Grove which backs onto the site



Photograph 3 - View from the site looking east towards Mushroom House garden boundary



Photograph 4 - View from PROW 14-3-FP 127 looking south-east towards Chatterton House



Photograph 5 - View from the site looking north towards existing woodland around Church Lane



Photograph 6 - View from Market Street, looking over the existing stone wall, across the site

View looking north along Market Street



View looking south along Market Street





3.0 The Need for Development in the Green Belt



3.0 The Need for Development in the Green Belt

There is a compelling case for removing land west of Market Street, Edenfield from Rossendale's Green Belt. The need to release the site from the Green Belt is justified by the emerging planning policy and housing supply position, exceptional circumstances that support alterations to the Green Belt and the fact that the site fails to adequately fulfil the Green Belt functions.

National Planning Policy

The National Planning Policy Framework (NPPF), published in March 2012, outlines the Government's core objectives for the planning system, which include the need for local authorities to boost their supply of housing. Releasing the Market Street, Edenfield site from the Green Belt to facilitate new housing development would be consistent with the core objectives of the NPPF because:

- It would meet the three pillars of sustainable development by delivering economic, social and environmental benefits (NPPF paragraph 7);
- It would be entirely consistent with the presumption in favour of sustainable development- the golden thread for both plan making and decision taking (NPPF paragraph 14);
- It would offer a sustainable location, in Edenfield, which is accessible to a range of sustainable transport modes, and a range of services and facilities (NPPF Paragraphs 29-41);
- It would boost significantly the supply of housing and provide a deliverable site that is available, suitably located, achievable and viable (NPPF Paragraph 47);

- It will provide a wide range of market and affordable housing of various types and tenures promoting mixed and inclusive communities (NPPF Paragraph 50); and
- There are exceptional circumstances that justify the removal of the site from the Green Belt in accordance with Chapter 9 of the NPPF (Paragraph 83), whilst also taking account of sustainable patterns of development (Paragraph 84).



Local Planning Context

Rossendale Core Strategy

The Development Plan comprises the Rossendale Core Strategy, which was adopted in November 2011, and covers the plan period 2011 to 2026. Core Strategy Policy 2 set a housing requirement of 3,700 across the period, equating to 247 dwellings per annum, which was based on the Regional Spatial Strategy target which has since been revoked. The majority of development was focussed on the larger urban settlements of Rawtenstall, Bacup, Haslingden and Whitworth.

Edenfield was included in the South West Rossendale vision area covered under policy AVP5, where it was considered as a Neighbourhood Centre, suitable for small scale infill development and the reuse of previously developed land.

Site Allocations and Development Management DPD

The Council then began work on the 'Local Plan Part 2- Site Allocations and Development Management Policies DPD' in 2012, which included a review of urban and Green Belt boundaries. Edenfield was one of 7 'Green Belt Areas of Review' identified within the Core Strategy, however the Green Belt Review only sought minor amendments and corrections to the Green Belt boundaries in Edenfield, as it did in most other settlements; on the basis that the majority of the Borough's Core Strategy requirement could be met within existing urban boundaries.

Figure 4: Rossendale Core Strategy – Green Belt Areas of Review.



The Draft Site Allocations and Development Management Policies document was published for consultation in July 2015, and sought two small residential allocations within the amended urban boundary of Edenfield. Some Green Belt sites were proposed for release in this document, which states (at Page 4 of the Housing Chapter):

"Green Belt releases have been avoided wherever possible. However it is recognised that some releases will be required to meet the housing requirements."

Therefore, the Council have accepted that exceptional circumstances exist for Green Belt release, based on the Core Strategy housing requirement, which is now out of date and not compliant with the NPPF approach to housing need.

In December 2015 the Council decided to begin work on a new Local Plan, after new housing need evidence suggested that the borough's Housing Market Area had changed, and that the Core Strategy housing requirement no longer reflected the full objectively assessed need (FOAN) of the area, and would need to be increased. Accordingly, the Site Allocations DPD was withdrawn in February 2016.

Emerging Local Plan (2019-2034)

Following withdrawal of the Site Allocations DPD, the Council began work on a new Local Plan to replace the Core Strategy, covering the period 2019-2034. The Council's last evidence base work from 2015 suggested that the Core Strategy target of 247 dpa was now beneath the minimum required to meet basic demographic growth and would need to be increased to somewhere between 285 and 370 dpa, over the period 2011 to 2031, to meet the full objectively assessed need (including the relevant uplifts for affordable housing and economic growth).

Applying this to a 15 year period suggests a total need of up to 5,550; which could require additional land to be identified for up 1,850 new dwellings, over and above the sites put forward as part of the Site Allocations process.

There is also a suggestion that Rossendale's Housing Market Area is no longer self-contained so will need to consider need across neighbouring areas, which include Greater Manchester, and the emerging Greater Manchester Spatial Framework (GMSF) which is due to go on consultation in Autumn 2016. This is particularly relevant in Edenfield where there is a clear market overlap with Ramsbottom and other parts of northern Bury. Therefore the new Local Plan will also need to take account of patterns of growth within the GMSF, which may require a further uplift to housing numbers.

In light of this increased need, the Council undertook a 'call for sites' exercise in March 2016 and confirmed that they would consider all sites for future allocation including Green Belt, again confirming that exceptional circumstances exist.

Housing Supply

The Council's latest Five Year Housing Land Supply Statement (covering the period 2015-2020, with a base date of 31st March 2015), suggests a 6.9 year supply based on the annual Core Strategy requirement.

However, this included all the sites proposed within the Site Allocations document, which has since been withdrawn, and these allocations made up 65% of this supply figure. Removing these sites from the supply means that the Council can only demonstrate a 2.4 year supply, and this figure is reduced to around 2 years based on the approach advocated in the latest national guidance. The increasing requirement in the emerging Local Plan will further reduce this supply figure which clearly demonstrates the urgent need to release sites.

The 5 year supply statement also notes that housing completions have not kept pace with requirements since 2011, with just 743 completions over 4 years, generating a shortfall of 245 against the Core Strategy requirement. Therefore, it is clear that the existing housing supply is not delivering the scale of development required to meet the Council's current housing targets, let alone its emerging targets which are due to increase significantly up to 2034.

The proposed residential development of this site will help to address this shortfall over the next 5 years and beyond and this should be considered as a key benefit of the scheme.

Figure 5: Green Belt Plan



Demonstrating The Exceptional Circumstances for Green Belt Release

Paragraph 83 of the NPPF states that once the extent of a Green Belt has been established, it should only be altered in exceptional circumstances, through the Local Plan process, and the Council have acknowledged that such circumstances exist in Rossendale. The exceptional circumstances which support the release of land at Market Street, Edenfield are as follows:

Housing Need

The principal exceptional circumstance relating to the release of Green Belt land in Rossendale is directly tied to the need to accommodate the Borough's projected needs over the new plan period up to 2034, which will also require them to consider growth patterns in the adjacent GMSF area.

As demonstrated in the previous section, the Council are unable to demonstrate a 5 year supply of deliverable sites going forward, and have consistently failed to deliver against their Core Strategy target in the past.

The emerging Local Plan must consider the implications of not releasing sufficient land from the Green Belt, and the harm that will occur from failing to meet the identified needs in the Borough; such as slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice. The proposed residential development of this site will help to address this shortfall over the next 5 years and this should be considered as a key benefit of the scheme.

Insufficient Land

Based on current supply evidence, Rossendale have less than 2 years supply of deliverable housing land. Between 2011 and 2014, over 70% of Rossendale's housing completions were on previously developed land, however the Council acknowledge that this will not continue as:

"the supply of sites without significant constraints within urban areas is relatively limited"

The major constraint in Rossendale is topography, as the Borough is characterised by a series of interlocking valleys where settlements have developed along valley floors, and therefore the majority of undeveloped land is on steep valley slopes or moorland tops. Poor ground conditions and flood risk are also significant issues. There are also significant areas of Green Belt in the south of the Borough, to separate Rossendale's settlements from the Greater Manchester conurbation, which is a further constraint.

Therefore it is clear that there is not enough land within Rossendale's urban areas to meet the future development requirements of the emerging Local Plan.

Affordable Housing Need

The 2008 SHMA confirmed that there was a chronic lack of affordable homes within the Borough, and suggested a net need of 327 dpa, a figure which exceeds the total Core Strategy housing target and would generate a need for nearly 5,000 affordable dwellings over the emerging plan period. Affordable completions between 2011 and 2014 totalled 181, equating to 60 dpa, which is clearly insufficient and is likely to have compounded affordability issues. The Council is in the process of updating the SHMA, to provide a more up to date position on affordable needs within the Borough.

It is clear that the delivery of large sites such as Market Street, Edenfield, which are viable, deliverable and available, will make a significant contribution to affordable needs within the Borough, whatever the figure identified in the updated SHMA.

Figure 6: Extract from proposals map



The Purposes of the Green Belt

To establish whether it would be appropriate to release a site from the Green Belt, it is relevant to examine how its development would impact on the five purposes of the Green Belt which are listed at paragraph 80 of the NPPF:

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

It is clear that the development of this site fails to fulfil these five purposes as it:

Will not result in unrestricted sprawl of large built up areas

The A56 dual carriageway forms a strong physical boundary to the west of Edenfield, and already restricts sprawl by ensuring that the urban area will not spread further west, whilst existing development provides defensible boundaries to the north and east, with a designated recreation area to the south, and development beyond that.

The presence of this major road and existing boundaries makes this site a logical extension to the village, as it will provide infill development up to road, to round off the settlement.

Will not cause neighbouring towns to merging into one another

The immediate area is characterised by rural villages with substantial green gaps between them. The nearest towns are some distance away, with the built up area of Ramsbottom 2km to the south west, and Helmshore 2.5 km to the north west, so development of this site will not affect them.

The A56 forms a strong physical boundary to the west of the site, and prevents Edenfield from merging with Irwell Vale, which is the nearest village. In fact, development of the site would not even close the gap between Irwell Vale and Edenfield as the closest point between the 2 settlements is further north (with an off-set of 540m, as shown on the Green Belt Plan). As such the development of this site will not cause any towns or smaller settlements to merge, and significant green gaps will be maintained around Edenfield.

Will not cause unacceptable encroachment into the countryside

The A56 dual carriageway already safeguards Edenfield from encroaching into the countryside, as it provides a strong physical boundary to the west, whilst the site is surrounded by development on the remaining 3 sides. As such the site currently serves little function as countryside and its development will provide a more logical and tangible boundary to the west.

This is clearly demonstrated in the next section which provides a landscape and visual analysis of the site and surrounding area.

Will not impact on the special character of historic towns

There are no historic towns within the vicinity of the site, and whilst Edenfield is a Quarry Village with its own unique heritage, it does not contain any Conservation Areas, and is not subject to any statutory heritage designations. There is a Listed Church nearby, but this heavily screened by trees which ensure that development of the site will have minimal impact on its setting.

As such, the site could be sensitively designed to ensure the character of the Listed Building and wider settlement are respected.

Will not discourage urban regeneration

Rossendale Council accept that the supply of deliverable brownfield sites is becoming exhausted and consequently, Green Belt release will be required over the life of the plan period.

The latest housing evidence set out in this section has demonstrated that there is insufficient land within Rossendale's existing urban areas to meet the development needs of the emerging Local Plan. This represents a clear exceptional circumstance for Green Belt release, which the Council fully acknowledge.

Given that the Market Street site does not fulfil the five purposes for including land in the Green Belt and is a sustainable and deliverable site, it is recommended that it be released from the Green Belt through the Local Plan process to help meet future housing needs.



4.0 Landscape and Visual Analysis



Figure 7: Wider Landscape Character



4.0 Landscape and Visual Analysis

Wider landscape character

Figure 7 illustrates the site in its wider landscape context as interpreted from the Landscape Strategy for Lancashire.

The site lies within the 'Settled Valleys'. These are 'high sided valleys of the River Irwell and its tributary streams which dissect the high moorland plateau of the Rossendale Hills'. The valley includes railways and roads, and urban development is clustered along the transport corridors on the valley floor. Woodland along the River provides some enclosure and a wooded setting to settlements.

Around Edenfield, higher land either side of the Settled Valleys is characterised as 'Moorland Fringe'. This is a rolling landscape of marginal pastures. Tree cover is sparse and settlement is confined to isolated farmsteads.

The highest land which contains the valley to the east and west is 'Moorland Plateau' and 'Moorland Hills'. These are large scale sweeping exposed landscapes. Land cover is typically blanket bog and trees are generally absent.

The context of the site within the Settled Valley Landscape

The site is located on the lower west facing slopes of the valley, generally below the level of existing development along Market Street.

The River Irwell meanders through the valley to the west of Edenfield. The sloping land surrounding the river forms a wide valley below the 200m contour. Land uses within the valley mainly comprise farmland, transport corridors, Edenfield village, other small settlements and some industrial land uses close to the river.

The East Lancashire railway follows the valley bottom. The M56/A56 corridor also lies within the valley to the east of the river and to the west of Edenfield. The A56 is a dual carriageway with two lanes in each direction. This is a dominant feature of the landscape.

The river corridor and its tributaries are well wooded creating a pattern of woodlands which extend along the valley bottom and up into the higher reaches of the valley. The railway, road corridors and urban areas are often framed with vegetation providing some sense of enclosure.

Edenfield village centre lies at the intersection of three main roads. Historic maps from the 1850's show settlement in this area and extending north along Market Street. Around the 1920's housing areas extended north and south from Bolton Road North, infilling the area between the A56 and the village centre, giving the southern part of the village its current widened form.

There are a range of housing types within the village, including traditional stone terraced housing, 1930's semi's, post war housing and detached houses built within the last 50 years. A recent planning approval for 10 houses on the former Horse and Jockey pub site on Market Street includes a single detached house and a mix of terraced and semi-detached houses arranged within a cul-de-sac.

Figure 8: Visual Context



Visual context

Figure 8 illustrates the main visual relationship between the site and the surrounding landscape.

The site is not visible from low lying land between the River Irwell and the A56 corridor due to topography and enclosure provided by significant belts of woodland within the valley.

The site is not visible from rising land to the East of Edenfield due to topography and existing development within the village.

The main locations from which the site is visible in the wider landscape are:

- From the site frontage to Market Street looking west;
- From high land to the west of Edenfield.

Views from Market Street

Market Street is generally developed on both sides with terraced housing which restricts most views to the east and west. The part of the site which borders Market Street remains as a rectangular area of open grassland contained by a stone wall approximately 1.5m tall. The wall generally screens views of the site from passing vehicles, however the high land to the west of Edenfield is visible above the wall providing a visual connection with the wider landscape (Photograph A).

Photograph B illustrates the view into the site over the boundary stone wall which can be experienced by pedestrians on Market Street. The roof of Mushroom House, the boundary wall and vegetation which surround it are visible at the back of the open field in the foreground. This property screens views to most of the site beyond. To the right of Mushroom House, as ground levels fall westwards, the lower parts of the site are partially visible and the A56 can just be seen. Vegetation on the west side of the A56 is visible, screening the river corridor beyond.

The value of the view from Market Street lies in the long and panoramic views across to high land on the far western side of the valley. Development of the site which ensures that the visual connection between Market Street and the high land to the west is retained would not be inappropriate.

Views to the site from the west

On higher land to the west of the River Irwell, Helmshore Road runs roughly parallel to the A56 at around 200m AOD. The alignment of Helmshore Road approximately defines the lower extent of views to Edenfield from the west, below this level views are increasingly screened by topography and intervening areas of vegetation. Views to the site from Helmshore Road occur at a distance of just over 1km and are seen in a wide panoramic context. Views from higher land to the west of Helmshore Road occur at distances greater than 1km.

Photograph C is taken from a public footpath close to Helmshore Road. The photograph illustrates the wide scale panoramic views across the valley, with Scout Moor and the Rossendale Hills visible as a backdrop. Urban development within the 'Settled Valley' is visually prominent on the lower slopes of the valley, with the urban edge generally softened by tree planting. The A56 corridor can just be delineated at a slightly lower level than Edenfield, often framed by woodland. The lower valley, in front of the A56, comprises pasture and woodland and is generally free from development.

Development of the site could be expected to result in a limited increased amount of urban development within a broad scale panoramic view which already features urban development and road infrastructure. Integration of new woodland planting at the boundary of the site along the A56 would tie into existing woodland areas, providing a strong boundary to the development and would assist in assimilating the development into the landscape.



Photograph A - View from Market Street looking towards site



Photograph B - View from Market Street looking over stone wall towards site



Photograph C - View from Helmshore Road near to PRoW 14-3 FP 117



5.0 Vision for the Site





5.0 Vision for the Site

An attractive housing development with distinctive local character offering a choice of high quality new homes to meet local needs.

Taylor Wimpey's vision for the site seeks to meet the following goals:

- Delivery of quality new family homes which make the best use of available land and meets the needs of Rossendale;
- Achieve a choice of housing with a mix of house types, tenures and sizes to meet identified local needs;
- Respect the character of the site and its setting;
- Provide high quality, accessible green space for the benefit of existing and future residents;
- Facilitate cycle and pedestrian links to community facilities, green spaces and the wider landscape;

- Invest in the community with the creation of additional direct and indirect employment both during and after the development. Taylor Wimpey UK Limited will also employ staff locally through the construction of the development;
- Create a safe and desirable place to live with an attractive environment that builds upon the strength of the local community;
- Provide high quality design which will complement and enhance the existing environment and create a good standard of amenity and living environment;
- Protect existing residential amenity; and
- Capitalise on site assets such as long views, characterful stone walls and an existing public right of way.



Figure 9: Site Analysis Plan



Approach

Taylor Wimpey has developed a visionary masterplan for the site which meets these objectives and is shown in this section. It demonstrates how the design and form of development will respond sensitively to the characteristics of the site and the wider area, and explains the contribution that the site could make to Edenfield. It is intended that these ideas will evolve further in consultation with the local community and key stakeholders at the appropriate time.

Site Opportunities and Constraints

The vision for the site derives from a careful analysis of the characteristics of the site, its context, and the opportunities and constraints which arise.

The highest part of the site which adjoins Market Street provides a break in built form along the road. Here the stone wall at the site frontage limits close views of the site, however there are views above the wall to the distant hilltops on the western side of the valley. There is an opportunity to retain and enhance the visual connection between Market Street and the wider landscape, potentially lowering the stone wall at the site frontage to open up views into the field at the entrance to the site.

Steep landform in the north western part of the site is unlikely to be suitable for development, however this part of the site can accommodate new woodland planting to assist in assimilating the development into the landscape. The lowest parts of the site, at the western edge, will be the most appropriate location for any potential surface water storage areas on the site. The site abuts existing residential development along most of the eastern boundary. The need to preserve residential amenity of existing properties will need to be considered as part of any development. There is an opportunity to improve the existing urban edge at the southern boundary of Alderwood Grove which is visible from Market Street.

The southern site boundary adjoins Edenfield recreation ground. Edenfield village centre is located to the east of the recreation ground. There is an opportunity to improve pedestrian connections to these areas.

The western site boundary runs parallel to the A56. Land further north and south features woodland planting which assists in visually obstructing the A56 and provides a wooded setting to Edenfield. Development of the site provides an opportunity to extend woodland planting along the A56 corridor, assisting with both noise and visual screening.

Within the site is a residential property called Mushroom House. The property is accessed along a track from Market Street, which is also a public right of way linking to a bridge over the A56. Mushroom House is well contained by stone walls and vegetation which restricts most outward views from the property. A stone wall runs along the access track to Mushroom House and continues along the public footpath as far as the western site boundary. Retention of these features will create a characterful development to complement Edenfield.

Highway access into the site can be safely taken from Market Street, ensuring that the existing access track to Mushroom House is not subject to any increase in traffic. The track could potentially be upgraded to provide a controlled emergency access into the site if required. An overhead power line bisects the southern field of the site. This can be diverted and will not restrict development.

The key principles of development arising from the opportunities and constraints are:

- The retention of part of the open field adjacent to Market Street to provide a break in built form and to retain visual connection to the hill tops to the west of the valley;
- The protection of the amenity value of the existing PROW and Mushroom House;
- The preservation of residential amenity of existing properties directly bordering on to the site;
- Consideration of the topography of the site and how residential development can complement this;
- Retention of existing stone walls within the site;
- The provision of a woodland and greenspace buffer area along the western site boundary to assist in screening the development from the wider landscape and to screen noise and views to the A56;
- Potential to improve footpath and cycle connections through the site and into the wider area.

There is potential on this site to develop a high quality residential scheme with a coherent landscape structure which conserves the natural assets present on the site as well as enhancing opportunities for recreation and pedestrian/cycle movement. **Figure 10: Concept Plans**

Development Concepts

The concepts which underpin the masterplan respond directly to the characteristics of the site.

Four key concepts can be identified:



Concept 1:

Create a greenspace with new woodland planting along the western edge of the site. This will extend existing woodland areas, providing a strong buffer between development and the A56, and will soften the urban edge of Edenfield in views from the west.



Concept 2:

Retain an area of open space adjacent to Market Street which provides a break in development and enables long views to the hill tops of Holcombe Moor to the west of Edenfield which contribute to a distinct sense of place.



Concept 3:

Protect the setting of Mushroom House and the existing Public Right of Way and stone wall within the site.



Concept 4:

Create a residential area which broadly follows the contours of the site. Integrate tree planting throughout the development to break up the roofscape and embed the development into the landscape.



Figure 11: Illustrative Masterplan



Illustrative Masterplan

The masterplan illustrates how the site could be laid out to ensure that the objectives illustrated by the key concepts can be met. An attractive residential area which will complement Edenfield is proposed. A highway access point into the site will be provided from Market Street. A large proportion of the field at the site entrance will be retained as open space with a soft village green character, allowing views to the distant hill tops to the west and retaining an attractive view to Mushroom House and its characterful stone wall setting. A new row of housing will be provided along the northern edge of the field creating a positive edge to this part of Edenfield when viewed from Market Street.

Within the site two green 'lanes' will link the entrance green to the western edge of the site. One of these will be aligned to point in a north westerly direction focussing the eye on distant views towards Tor Hill, the second will follow the route of the existing Public Right of Way through the site and its companion stone wall. This green corridor will open up at Mushroom House enabling the characterful stone walls at the property boundary to be appreciated while also ensuring that the property does not become enclosed by development.

A further greened street is proposed to link the existing Public Right of Way to Edenfield recreation ground. This will promote the use of this greenspace and will also facilitate connectivity to the shops and services in the village centre.

The western edge of the site will provide a broad greenspace corridor. The corridor will include wide belts of woodland planting to frame and enclose the site. The woodland will provide an appropriate screen to hide any fencing or landform which may be necessary to reduce noise from the A56, and will assist in blending the development into its surroundings when viewed from high land on the west of the valley. Gentle landform modelling would enable the creation of sustainable draining ponds as part of the development. The greenspace also has potential to accommodate new pedestrian and cycle routes through the site and into the wider area.

Internally the development will be served from a road loop which will in turn link to a hierarchy of shared surface roads, cul-de-sacs and private drives. The road alignment throughout the development is proposed to loosely run along the contour lines to complement the urban form in the settled valleys. Tree planting would be integrated throughout the development to further embed it into the landscape.

The high quality residential scheme proposed will deliver the following key features:

- Approximately 240 dwellings at a net density of 30 dwellings per hectare;
- Over 4 hectares of safe and multifunctional greenspace, providing recreational and environmental benefits;
- An enhanced and accessible village 'green' on Market Street;
- Extensive new footpaths and cycleways;
- Extensive new tree and hedgerow planting;
- Noise screening to the A56 for the benefit of existing and future residents.

The masterplan demonstrates that the site is capable of delivering a high quality scheme which will complement the wider area and deliver a range of attractive benefits. Figure 12: Illustrative Hand Drawn Sketches.

View 1: View north west from Market Street



View 2: View east along public right of way



Character Areas

Development character is a function of layout, building style, and landscape treatments, which combine to create a sense of place. Three different areas will result from the masterplan as illustrated on the adjacent plan.

Edenfield Lanes:

The Edenfield Lanes comprise the housing areas which front onto the Market Street village 'green' and the green routes through the site which branch off from the green. The housing in these areas will be medium density comprised largely of detached and semi-detached properties with front gardens. Properties will be restricted to 2 storeys to ensure that views to western hill tops are retained from Market Street. Building materials will strongly complement the prominent building materials used along Market Street to create a well linked and cohesive character. Greenspaces will be semi-formal in character featuring mown grass and individual tree planting. Stone wall details will be incorporated into boundary treatments at appropriate locations.

Lower Valley Edge:

The Lower Valley Edge includes the housing area which fronts onto the western greenspace. The housing along this frontage should be mediumhigh density with a tight built form. Some 2.5 and 3 storey properties may be appropriate on this lowest part of the site to complement the scale of the adjacent greenspace and woodland, and to punctuate the street scene.

Inner Squares:

The Inner Squares are development areas with a limited visual connection with the wider landscape. These areas have a greater flexibility over the type of housing and materials used. Housing may be served by a combination of road types, including main streets, shared surface roads, cul-de-sacs and private drives, as appropriate to the location within the site. Development at higher densities is likely to be appropriate with a more urban character than the other character areas of the site.

Figure 13: Character Areas



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Figure 14: Phasing Plan



Phasing

It is anticipated that the site would be built out over a 4 to 5 year period. Three phases of development are indicated on Figure 14. The development phases would logically and gradually extend Edenfield in a westward and northward direction from the village centre up towards Church Lane.



6.0 Sustainable Development Principles



Figure 15: Sustainability Plan


6.0 Sustainable Development Principles

The Market Street site represents a highly sustainable solution to the Borough's housing needs which will generate economic, social and environmental benefits in accordance with the three pillars of sustainable development, whilst delivering the type, quality and quantity of new homes to support the growth of Rossendale over the Local Plan period.

Location and Accessibility

The site is situated to the east of Market Street in Edenfield. The site is approximately 350m north of the centre of Edenfield, which is designated as a Neighbourhood Centre in the adopted Core Strategy.

A variety of local facilities and amenities are available within the local catchment, with Table 7.1 providing examples of walking distances to key amenities.

Local Amenity	Distance (metres)			
The Coach & Horses public house	370			
Edenfield Parish Church	450			
Market St Newsagents	450			
Edenfield Village Pharmacy	460			
Edenfield Church of England Primary School	500			
Edenfield Cricket Club	620			
Edenfield Mini Market	930			
The Duckworth Arms	1,500			
Table: Distance from Site to Local Facilities				

The site is well served by the existing public transport network. The nearest bus stop to the site is located to the east of the site on Market Street, approximately 220 metres walking distance from the centre of the site. Further bus stops are located to the north east and south east of the site along Market Street.

These bus stops offer up to 6 services per hour, providing direct access to destinations including Burnley, Rawtenstall, Accrington and Bury. Bury bus station, and the adjacent Metrolink station, provide links to a wider range of local and regional destinations. The bus services operate from 6:30 am until 7pm, proving the opportunity for residents to travel by public transport for commuting and leisure trips.

There is a train station in Irwell Vale within 2km of the site; however this is part of the East Lancashire Heritage Railway between Heywood and Rawtenstall and does not provide a commuter service. That said, there was an aspiration in the Site Allocations and Development Policies document to develop this into a commuter link, and the development of this site would fully support this aspiration through increased patronage at Irwell Vale station. There are also opportunities to improve pedestrian links between the site and the station via the existing public rights of way and the bridge across the A56.

With regard to cycling, National Route 6 is located around 750 metres west of the site, whose route passes through Manchester to the south and Blackburn and Preston to the north. Additionally, Regional Route 91, the 'Lancashire Cycle Way', is situated approximately 1.4 kilometres west of the site, which is ideal for recreational cycling and provides links to numerous destinations across Lancashire.







The site is located in close proximity to a number of community facilities that could be accessed and utilised by residents.

Edenfield Primary School is 450m north of the site and Stubbins Primary School is 1.5km to the south. The nearest secondary school is 2.4km to the north and accessible by bus, including dedicated school buses.

Other community facilities include the Recreation Ground to the south which is in use as a nursery, Edenfield Parish Church 450m to the north, and Edenfield Cricket Club, 620m south east of the site.

The site is a sustainably located development opportunity located within easy access of a range of local services, employment opportunities and public transport routes.

Economic Investment

The development of the site will contribute to building a strong, responsive and competitive economy. In particular, the development of approximately 240 dwellings will secure a number of economic benefits in terms of job creation, tax revenues to the Council and increased expenditure in the local economy.

Housing supply can play a key role in the flexibility of the local labour market which is an important component in local economic competitiveness and maintaining a dynamic economy. This is because a shortage of housing or lack of affordability can act as a barrier to people accessing employment opportunities or result in long distance commuting and associated sustainability impacts.



8

Direct construction-related employment:

The proposed development could support around 233 person years of direct employment within the construction sector. This translates into 39 Full Time Equivalent (FTE) roles on-site per annum over the estimated six-year build programme.

The development of the Market Street site will support the local

labour market, and will generate the following specific benefits:



Construction impact in the supply chain: A further 54 FTE jobs could be supported each year locally through indirect and induced effects during the construction phase.



Contribution of construction phase to economic output:

The proposed development could contribute an additional £4.4million of gross value added (GVA) annually to the local economy during the construction period.

Household spend:



Once fully built and occupied, the households are estimated to generate expenditure in the region of £5.8 million per annum. This could support additional shops and services within the centre of Edenfield, and elevate its role as a service centre. It would also support the Council's aspiration to develop the East Lancashire Railway into a commuter service as it could greatly increase patronage at Irwell Vale station.

Increased Council Tax income:

The construction of the new homes could generate around £374,000 per annum in additional Council Tax revenue for Rossendale Borough Council, once fully developed and occupied.



New Homes Bonus revenue:

The proposed development has the potential to generate in the region of £1.7million in New Homes Bonus revenue for Rossendale Borough Council and £422,000 for Lancashire County Council.

















Community Benefits

The development of the site will also perform a social role by generating the following community benefits:

- Provide a range of open market housing comprising various types to meet the needs of the local community.
- Provide up to 72 affordable homes of a range and type to meet the identified need in the Rossendale area.
- Provide over 4 Ha of public open space and outdoors sports provision for future residents and the wider community in accordance with Rossendale's policy requirements. The proposals for the site can deliver integrated open space that complements and strengthens links to the existing Recreation Areas to the south.
- Assist in the provision of other facilities where there is an identified need, in accordance with development plan policies.

Taylor Wimpey in the Community

Taylor Wimpey is committed to making a difference in the local community and working with local educational establishments and job seeking agencies in order to facilitate local apprenticeships and training initiatives, and to ensure that employment generated from the development is sourced from and directly benefits the local area.

Environmental Considerations

Landscape & Visual Impact

As confirmed within the landscape analysis, the site is not subject to any formal landscape designations, other than its location in the Green Belt which is addressed in Chapter 4. The site lies on the northern fringe of Edenfield within a character type referred to as 'Settled Valleys'. This landscape character type includes the 'high sided valleys of the River Irwell and its tributary streams which dissect the high moorland plateau of the Rossendale Hills'.

In terms of visual impacts, whilst there are some long distance views into site, these can be maintained and mitigated through sensitive masterplanning.

As such, it is not anticipated that the development of the site will have a significant impact on landscape character or visual amenity.

Ecology and Trees

The site is not within or near to any designated ecological area, and as such is unlikely to have an adverse ecological impact.

The site is not subject to any Tree Preservation Orders (TPO's), and the majority of trees and vegetation are found around the perimeter of the site, with many of these falling outside the site boundary (such as those belonging to Mushroom House, the Nursing Home to the north and the Recreation Ground to the south). The site is predominantly open pasture land with patches of vegetation.

That said, all trees and vegetation within the site will be retained where possible, and significant new planting will be proposed as part of the development, for biodiversity purposes as well as screening and landscaping.

Therefore, there are no ecological or arboricultural constraints preventing the development of the site and appropriate mitigation will be provided where necessary.

Archaeology & Heritage

There are no Listed Buildings, Conservations Areas or other designated archaeological features either within or directly adjacent to the site. The Grade II Listed Edenfield Parish Church is located 100m north west of the site, however this is not visible from the site and is so well screened by existing tree cover that the proposed development will have a negligible impact on its setting.

A full archaeological assessment will be undertaken at planning application stage to identify if any mitigation measures are required, however at this stage there are no archaeological constraints that would prevent development of this site.

Flooding & Drainage

The site is entirely within Flood Zone 1, which means it has a low probability of fluvial flooding and is suitable for all types of land use, including residential, in accordance with the NPPF, and therefore there are no flooding constraints preventing the development of this site.

Noise

The main source of existing noise comes from the adjacent A56 dual carriageway. As such an initial Acoustic Assessment has been undertaken, which confirmed that the noise impacts from the A56 can be mitigated through a strong development buffer to the western boundary, as reflected in the Illustrative Masterplan, and attenuation features such as barriers and tree cover. As such, there are no noise constraints preventing the development of the site.

Ground Conditions

A desktop assessment suggests that the site has not been subject to intensive development, reflective of its use as agricultural pasture land, albeit there is evidence of a potential landfill area in north west corner of the site; which will require further intrusive investigation at planning application stage, although this will not prevent development on the wider site.





Agricultural Land Classification

A review of Lancashire's land mapping confirms that the site is Grade 4 Agricultural Land, which is defined as poor agricultural land and not the best and most versatile. Therefore, there are no agricultural land constraints preventing the sites development

Highways

Initial assessments of the adjoining highway network undertaken by Croft, confirm that there is sufficient capacity within the existing strategic highway network to accommodate this development of approximately 240 homes, with minimal highway improvements required within the highway boundary. Taylor Wimpey will consult with the local highway authority, Lancashire County Council, on appropriate mitigation to the local highway network.

The site boundary incorporates frontage to the B6527 Market Street adopted highway. Vehicular access to the site could be provided for off Market Street in the form of a simple priority controlled junction, in the location identified on the current Illustrative Masterplan. The proposed vehicle access would have a 5.5 metre wide carriageway, 2 metre footways on either side and would incorporate 10 metre corner radii.

Consideration has also been given to the potential to provide a priority junction with right turn lane, should this be requested by the local highway authority. Although this would result in the access being moved further south along the site frontage.

Separate emergency access can also be accommodated from Market Street.

The development proposals will promote pedestrian connectivity by maintaining the existing right of way through the site, whilst creating new pedestrian links and connecting to the nearby rights of way. The site will also link with the existing footway network and local amenities in the vicinity of the site. In terms of wider access issues, it is noted that potential exists to enhance the current level of services while improving overall infrastructure that will serve the wider community as well as new residents.

There are no existing highways constraints preventing the site coming forward. However, where required, off-site highway improvements will be undertaken in agreement with the Highway Authority.

Utilities

An initial assessment of existing Utilities has confirmed that electricity, gas, water and telecommunications can be provided to the site without adversely impacting on the provision of services to the wider community. There is also an overhead power line that bisects the southern field, but this can be diverted and will not restrict development.

Therefore, the provision of services will not constrain the development of the site.

Sustainability Conclusions

There is a compelling need to deliver the development needs of the Rossendale Borough in an appropriate way. The future development of the site would deliver a range of sustainability benefits whilst creating no adverse local impacts. The development of this site is a wholly appropriate and sustainable outcome, which in itself delivers a wide range of local benefits, not least an increase in market and affordable housing. Moreover, the development will deliver significant inward investment from the private sector.



7.0 Deliverability



7.0 Deliverability

The site will make a valuable contribution with the delivery of approximately 240 dwellings to meet the Borough's housing needs requirements as well as meeting the qualitative need to provide family and affordable housing within the area. It is therefore important that the site is deliverable in accordance with the requirements of the NPPF.

The NPPF and NPPG specify that local planning authorities supply sufficient specific deliverable sites to deliver housing in the first 5 years. To be considered deliverable, sites should, at the point of adoption of the relevant local development document:

- **Be Available:** there is confidence that there are no legal or ownership problems.
- **Be Suitable:** offer a suitable location for development and would contribute to the development of sustainable and mixed communities.
- **Be Achievable:** there is a reasonable prospect that housing will be developed on the site at a particular point in time.

This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors.







Available

Taylor Wimpey UK Ltd has legal control of the site, and is seeking to develop the site at the earliest opportunity. The site is therefore in the control of a major national housebuilder and could deliver 240 new homes that will be critical to meeting housing need during the Plan Period.

If the site were to be released from the Green Belt and allocated for housing, Taylor Wimpey would seek to develop the site immediately, which would contribute considerably to the Borough's 5 year housing land supply and deliver highly anticipated new homes early in the Plan Period. This commitment to delivery is demonstrated by Taylor Wimpey's track record of the efficient delivery of high quality greenfield housing schemes across the North West.

This is particularly relevant in Rossendale, where the Council has persistently failed to achieve its annual housing target over the past 4 years, and therefore has a shortfall to address within the next 5 years.

Suitable

The site is suitable for housing development because it:

- offers a suitable location for development and can be developed now;
- would consolidate and round-off the settlement to the west of Edenfield, and infill up to the existing physical boundary provided by the A56;
- can utilise existing infrastructure surrounding the site with no utilities or drainage constraints preventing the site coming forward for development;
- can accommodate satisfactory vehicular access, existing bus stops are in close proximity and the local highway can accommodate the provision of 240 additional dwellings;
- will deliver generous areas of open space for use by residents and the local community;
- is not subject to any ecological or environmental constraints preventing development on the site; and
- is sustainably located with several local facilities within walking distance of the site boundary, including a primary school, shops, and recreation uses.

The site is therefore suitable in accordance with the NPPF.

Achievable

The delivery of approximately 240 dwellings would make a significant contribution towards meeting the housing needs of the Borough. An assessment of the site constraints has been undertaken which illustrates that delivery of the entire site is achievable and deliverable, and a professional team of technical experts has been appointed to underpin this assessment and support the delivery of the site moving forward. Where any potential constraints are identified, Taylor Wimpey has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers.

Taylor Wimpey has reviewed the economic viability of the proposal in terms of the land value, attractiveness of the locality, potential market demand and the projected rate of sales in Edenfield; as well as the cost factors associated with the site including preparation costs and site constraints.

Taylor Wimpey can, therefore, confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that residential development can be achieved within 5 years.



8.0 Conclusions





8.0 Conclusions

The Market Street Edenfield site presents an exceptional opportunity to meet the future housing needs of Rossendale in a location that would not undermine the purpose and function of the Green Belt. This Development Statement sets out the case for allocating the site for housing development within the emerging plan period, as well as the exceptional circumstances that support the alteration of the Green Belt in the Borough, a position the Council support.

The allocation of this site for residential development will deliver open market and affordable housing of a type, quantity and quality that will make a significant contribution to the future growth needs of Rossendale.

Key Benefits

Accordingly, this Development Statement has demonstrated that the Market Street site:

- is entirely suitable, deliverable and viable for housing development; and will deliver a mix of housing types, including both market and affordable homes;
- is sustainably located in proximity to a range of amenities, services and facilities;
- is supported by clear exceptional circumstances for Green Belt release, including an urgent need for new market and affordable homes, and a shortage of available land within existing urban areas;
- is entirely appropriate for Green Belt release and allocation as a residential development site, as it is well contained by existing physical features and forms a logical extension to the village, without compromising the core purposes of the Green Belt;

- is not subject to any technical or environmental constraints that would prevent the delivery of housing;
- can deliver a landscape led masterplan that complements the surrounding site context, and creates a high quality housing development;
- will provide a network of high quality open spaces, with links to the existing Recreation Areas to the south.
- will create a more natural and defensible Green Belt boundary to the west of Edenfield; and
- generates significant socio-economic benefits by providing housing choice, and stimulating job creation and economic investment. Increased consumer spending will also help to support additional shops and services within Edenfield, which could elevate its role as a service centre.

Summary

The development of the site at Market Street, Edenfield provides a highly sustainable opportunity to support the national growth agenda and to assist in providing adequate land to deliver a new Local Plan for the Borough. The site will deliver the quantity, type and quality of homes that is required across the Borough and can demonstrate exceptional circumstances that support an alteration to the existing Green Belt without impacting on its core functions.

Taylor Wimpey is committed to working collaboratively with the Council and Key Stakeholders to ensure that the Borough's housing need is met in a sensitive and sustainable manner.





Appendix I: Taylor Wimpey UK Limited





Appendix I: Taylor Wimpey UK Limited

Taylor Wimpey UK Limited is a dedicated homebuilding company with over 126 years' experience, we have an unparalleled record in our industry. We aim to be the homebuilder of choice for our customers, our employees, our shareholders and for the communities in which we operate.

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers' quality of life and adds value to their homes. We draw on our experience as a provider of quality homes but update that, to the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry. Our 24 regional businesses in the UK give our operations significant scale and truly national geographic coverage.

Each business builds a range of products, from one bedroom apartments and starter homes to large detached family homes for every taste and budget and as a result, our property portfolio displays a surprising diversity. The core business of the company is the development for homes on the open market, although we are strongly committed to the provision of low cost social housing through predominantly partnerships with Local Authorities, Registered Social Landlords as well as a variety of Government bodies such as the Homes and Communities Agency.

With unrivalled experience of building homes and communities Taylor Wimpey today continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction. Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike. Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major plc.

Taylor Wimpey Strategic Land, a division of the UK business, is responsible for the promotion of future development opportunities, such as this site, through the planning system. The local business unit that will, in conjunction with Strategic Land, carry out housing and related development as part of this is Taylor Wimpey North West based in Warrington.

Sustainability Plan



Appendix 2: Site Sustainability

Access to Education Facilities Access to Retail Facilities

Education facilities are shown in yellow on the Sustainability Plan and described below:

There are two primary schools within 2km of the site comprising:-

- Edenfield Church of England Primary School (0.5km);
- Stubbins Primary School (1.5km).

The Haslingden High School falls just beyond the 2km catchment (2.4km from the centre of the site). In addition, the Recreation Ground to the immediate south of the site is in use as a nursery.

The Market Street site is therefore well located in relation to education facilities and thereby accords with national planning guidance on the location of housing development. The site is located within close proximity of a variety of services and facilities, meeting local shopping and employment requirements for the site. The below listed retail facilities are indicated in light green on the Sustainability Plan.

Neighbourhood stores in the vicinity of the site include:

- Market Street News (450m);
- Valentine's Butchers (530m);
- Sixsmiths Bakery (550m);
- Edenfield Mini Mart (1km).

The Village Pharmacy is located approximately 450m south of the site.

The Market Street site is therefore well located in relation to local shops and services and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

Access to Sports and Recreation Facilities

Sports and recreation facilities are shown in green on the Sustainability Plan. The site is located in close proximity to the following key sports and recreation sites:-

- Children's play area (Exchange Street) (0.6km);
- Edenfield Cricket Club (0.6km).

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The Market Street site is therefore well located in relation to sports and recreation facilities and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

Access to Healthcare & Community Facilities

The community facilities listed below are shown in pink on the Sustainability Plan opposite:

• The Village Pharmacy (450m).

The site is located in close proximity to a number of public houses, restaurants and takeaways:

- The Drop Off Cafe (350m);
- The Coach and Horses (350m);
- Golden Kitchen (430m);
- Bizzy Plaice Fish and Chips (480m);
- Rostron Arms (530m).

The site is also around 450m of Edenfield Parish Church.

The Market Street site is therefore well located in relation to community services and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

Taylor Wimpey

Market St Edenfield

Published by Taylor Wimpey UK Limited



APPENDIX 2 - EDENFIELD ALLOCATION - LANDOWNER MEMORANDUM OF UNDERSTANDING

Draft Local Plan Policy HS3: Edenfield

Housing Allocation

The Rossendale Draft Local Plan identifies a 26ha (64 acre) parcel of land to the north and west of Edenfield for release from Green Belt and allocation for housing development. Policy HS3: Edenfield sets out the requirements for the development of this site which includes a comprehensive masterplan being developed for the entire site, implementation in accordance with an agreed Design Code, an agreed phasing and infrastructure delivery schedule, and a programme of implementation – all to be progressed as part of the evolving Local Plan process.

This Draft Land Allocation comprises a number of separate land ownerships. The major landowners collectively support the draft HS3 allocation and have put forward their individual sites (parcels of said allocation) for consideration as part of the preparation of the Draft Local Plan.

In compliance with the draft policy, the landowners are committed to working together to enable the entire HS3 allocation to be delivered. An initial meeting has been held and it is agreed that a joined up approach to development of a masterplan will be taken, in partnership with Rossendale Borough Council and other relevant stakeholders, including the local community in and around Edenfield.

As infrastructure requirements are defined and specified for the allocation as a whole, the landowners with the Council and other relevant Stakeholders will work together to ensure that necessary requirements are incorporated into the masterplan and the phasing and delivery programme. Likewise, where technical assessments are needed, a joined up allocation wide approach will be sought. In particular, the following matters will be collectively addressed, so far as possible:

- Appropriate buffers adjacent to the A56 will be included to ensure that new homes are protected from unacceptable levels of noise.
- Key views across the site to the Rossendale Valley will be protected and maintained, where appropriate.
- Design and layout will consider the setting of Edenfield Parish Church, Market Street/ Horse and Jockey, and the amenity of existing housing.
- A movement framework will identify key access points and circulation within the site for vehicles, cycles and pedestrians.
- Key principles will be developed for contextual design, architectural styles and materials.
- Ecological and nature conservation, flood risk and drainage considerations will be investigated further and mitigation identified.
- Requirements for open space and play areas will be identified together with a strategy for delivery.
- Transport implications of the cumulative development.

Individual representations have been produced and submitted to illustrate the suitability and deliverability of each specific parcel of land within the wider allocation as well as echoing support for the wider DLP allocation. This statement however, should be taken as reassurance that going forward the major landowners are committed to working together to deliver this strategically important development in Edenfield, in accordance with the aspirations of Policy HS:3 and will seek to engage with the Council and other relevant Stakeholders.

Turley

5th October 2017



APPENDIX 3 - EDENFIELD ALLOCATION - OPPORTUNITIES AND CONSTRAINTS PLAN



LANDSCAPE ARCHITECTURE ENVIRONMENTAL PLANNING MASTERPLANNING URBAN DESIGN

Canada House, 3 Chepstow Street, Manchester M1 5FW 0161 228 77294 mail@randallthorp.co.uk www.randallthorp.co.uk

- Existing vegetation Listed buildings Bridge
- 111 Steep slopes

A56 Source of noise

- Positive frontage
- Noise buffer along 11111 A56 interface as required
- Potential highway access \leftarrow
 - Potential footpath links

Drawn by: CD Checker: JF Rev by: CD Rev checker: JF

QM Status: checked

Product Status: **Client Review**

Edenfield Local Plan Representations

Opportunities and Constraints

Drwg No: 610C-01B Scale: 1: 5000 @ A3



APPENDIX 4 - RANDALL THORP LANDSCAPE REBUTTAL - MARKET STREET, EDENFIELD

LANDSCAPE ARCHITECTURE ENVIRONMENTAL PLANNING MASTERPLANNING URBAN DESIGN



Rossendale Draft Local Plan

Rebuttals to Council's Evidence Base relating to Market Street, Edenfield

18 September 2017

Prepared for:





Canada House 3 Chepstow Street Manchester M1 5FW

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Contents

1.	Introduction	4
2.	Rossendale Green Belt Review (November 2016)	5
3	Lives and Landscapes Assessment for Rossendale Borough Council (July 2015)	9

1. Introduction

- 1.1. Land west of Market Street, Edenfield is being promoted by Taylor Wimpey for the delivery of approximately 240 new family and affordable homes during the next plan period. The site extends to 12.5 Ha and is located to the north west of the village of Edenfield, bounded by Market Street to the east and the A56 to the west.
- 1.2. The case for allocating this site for housing development as part of the emerging Rossendale Local Plan has been presented within a Development Statement relating to the site which was submitted to Rossendale Borough Council in September 2016. The Development Statement outlines the exceptional circumstances that support the need to amend the Borough's Green Belt. The allocation of this site for residential development will deliver open market and affordable housing of a type, quantity and quality that will make a significant contribution to the future growth needs of Rossendale.
- 1.3. The site has been included as a draft allocation within the new Draft Local Plan, which we strongly support, however we have concerns over the analysis and conclusions in relation to the site as presented within the following evidence base documents for the Draft Local Plan:
 - Rossendale Green Belt Review (November 2016);
 - Lives and Landscapes Assessment for Rossendale Borough Council (July 2015)
- 1.4. This note considers the assessment of the site within these two reports, drawing attention to analysis and/or conclusions with which we disagree, or where we consider that further clarification or detail is required within the evidence base documentation.

2. Rossendale Green Belt Review (November 2016)

The study and its aims

- 2.1. The Taylor Wimpey site, referred to as 'Market Street, Edenfield' is currently designated as Green Belt and is therefore subject to assessment as part of the Rossendale Green Belt Review (November 2016).
- 2.2. The site is referenced as **parcel 43** for the purposes of the Green Belt Assessment. This land parcel includes some buildings and woodland at its northern extent which are outside of the proposed Taylor Wimpey site.
- 2.3. The purpose of the Green Belt Review is to 'assess the extent to which the land within the Rossendale Green Belt performs the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF)'. These are:
 - **Purpose 1**: To check the unrestricted sprawl of large built up areas;
 - **Purpose 2**: To prevent neighbouring towns merging into one another;
 - **Purpose 3**: To assist in safeguarding the countryside from encroachment;
 - **Purpose 4**: To preserve the setting and special character of historic towns;
 - **Purpose 5**: To assist urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.4. The NPPF attaches great importance to Green Belts and stresses that their essential characteristics are 'openness and permanence'.
- 2.5. One of the key aims of the Rossendale Green Belt Review is to 'provide clear conclusions on the relative performance of Green Belt which will enable Rossendale Borough Council to consider whether there are 'exceptional circumstances' (under paragraph 8, NPPF) to justify altering Green Belt boundaries through the Local Plan process, i.e. to enable existing Green Belt land to contribute to meeting Rossendale's housing needs.'

The report conclusions in respect of the site

- 2.6. The overall conclusion of the assessment in relation to parcel 43 is that the site does have potential to be released from the Green Belt. The resulting degree of harm to the Green Belt has been assessed to be *'medium'*.
- 2.7. Medium degree of harm is defined as a site which 'makes a MODERATE contribution to one or more GB purposes. No STRONG contribution to any purpose'.
- 2.8. The following table indicates the assessment ratings for parcel 43 against the purposes of Green Belt:

	Assessed contribution to Green Belt Purposes				
	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
Parcel reference	To check the unrestricted sprawl of large built up areas		To prevent neighbouring towns	To assist in safeguarding the	To assist in urban regeneration, by encouraging the
	Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?	Does the parcel protect open land from the potential for urban sprawl to occur?	merging into one another	countryside from encroachment	recycling of derelict and other urban land
43	Moderate	Moderate	Weak	Moderate	No contribution

The contribution of the site to Green Belt Purpose 1: to check the unrestricted sprawl of large built up areas

- 2.9. Appendix 4.1 of the Green Belt Review contains the 'Detailed Green Belt Assessment' for each site.
- 2.10. Against purpose 1 the notes for land parcel 43 state *'there are a limited number of urbanising features within the parcel'*, and conclude that the site provides a *'moderate'* contribution to Green Belt purpose 1.
- 2.11. It is accurate to state that the site itself has limited urbanising features, however the assessment gives limited consideration to the influence of the immediate surroundings upon the site. The site is currently 'sandwiched' between residential properties within Edenfield on higher land to the east, which overlook the site, and the A56 dual-carriageway to the west which is a source of noise and features visible street lighting. These urbanising features detract from the existing sense of openness within the site (as is acknowledged in the Assessment) and provide an urban-fringe character to the site itself.
- 2.12. The urban-fringe nature of the site, and its physical severance from the wider open landscape to the west, beyond the A56 dual-carriageway, mean that the site has potential to accommodate appropriately designed residential development without the development appearing as urban sprawl.
- 2.13. Existing built form in the north of Edenfield currently presents the form of 'ribbon development' extending northwards from a more 'rounded' southern part of the village. Ribbon development can, in itself, be considered as a form of urban sprawl. Appropriate development of the site would result in a 'rounding-off' of development in the northern part of Edenfield. Development would be extended up to a strong and permanently defensible boundary in the form of the A56, with no further potential for urban sprawl to occur beyond

the land parcel to the west. As the Assessment concludes at Table 4.4 'this could create a stronger Green Belt boundary and settlement edge'.

- 2.14. Land to the south of the site is currently part recreation land, presenting some urban characteristics, and part agricultural land in the form of a small field which is influenced by existing surrounding housing to the south, and framed by woodland to the west. This land is also being considered for Green Belt release and is assessed in the Green Belt Assessment as land parcel 44.
- 2.15. On the basis of the above, it is our consideration that land parcel 43 provides a limited and therefore 'weak' contribution to the overall purpose 1 of the Green Belt: to check the unrestricted sprawl of large built up areas, particularly if considered along with the strategic release of the immediately adjacent land parcel P44 to the south.

The contribution of the site to Green Belt Purpose 3: to assist in safeguarding the countryside from encroachment

- 2.16. Appendix 4.1 of the Green Belt Review contains the 'Detailed Green Belt Assessment' for each site.
- 2.17. Against purpose 3 the notes for land parcel 43 state 'there is a sense of encroachment within the parcel as a result of a small number of detached properties located along the eastern boundary, and the visual influence of the adjoining settlement edge to the east, and the presence of the A56 dual-carriageway which defines the western boundary. The majority of the parcel comprises farmland it displays the characteristics of the open countryside but lack a strong and intact rural character'. The notes conclude that the site provides a 'moderate' contribution to Green Belt purpose 3.
- 2.18. The Assessment acknowledges the urbanising influences upon the site, but undervalues the detachment from the wider countryside that the site has due to the A56 dual-carriageway. As already discussed, the site presents an urban-fringe character relating more strongly to the urban settlement than the wider countryside, which is considered to be the low lying River Irwell valley to the west of the A56 dual carriageway and the rising hills of Holcombe Moor beyond, which are strongly rural and open in character. The A56 dual carriageway provides a strong and permanently defensible boundary to the open countryside to the west which would safeguard the true 'open countryside' from encroachment.
- 2.19. On the basis of the above, it is our opinion that although land parcel 43 contains characteristics of the countryside it is influenced by urban development (roads with street lighting, existing housing, and a formal recreation area) on all sides. The urban influences compromise the sites openness and create an 'urban fringe' character rather than an 'open countryside' character. It is therefore our consideration that the site makes a limited and 'weak' contribution to purpose 3 of the Green Belt: to assist in safeguarding the countryside from encroachment.

Resulting degree of harm to the Green Belt

2.20. Based upon the above, we consider that the site provides only 'weak' contributions to the purposes of the Green Belt and therefore the potential level of harm caused by the release of the site from Green Belt in accordance with the 'Framework for assessing harm' at Table 4.2 of the Assessment should be 'low'.

Appropriate design mitigation

- 2.21. At Table 4.5, the Green Belt Assessment considers potential mitigation measures which could be applied to minimise effects on the wider Green Belt designation (if the sites were to be released).
- 2.22. The Assessment considers that development within the parcel should be limited to *'appropriate small scale and low density housing',* and that *'new properties should be a maximum of two storeys to minimise the negative impact on the openness of neighbouring Green Belt land'.*
- 2.23. We consider that the masterplan, as presented within the submitted Development Statement, demonstrates that appropriate placement of housing and open space are the most critical considerations to appropriate development of this site. These factors can ensure that valued views are retained within any proposed development.
- 2.24. Valued views have been identified as:
 - Views to distant hills from the existing break in development on Market Street;
 - Views to Edenfield from the wider landscape to the west ensuring that new development does not protrude above the existing development skyline of Edenfield.
- 2.25. In order to protect valued views building height should be considered in the development of a masterplan, however due to the sloping nature of the site it may not be necessary to restrict all proposed properties to 2 storeys. While we assume that the majority of development within the site would be 2 storeys, it may be appropriate to include some 2.5 storey dwellings on lower or less visible parts of the site. These can add interest to a street scene
- 2.26. We disagree that development density is a critical consideration in the potential development of this site. 'Low density' development is not a guarantee of high design quality. Development upon this site does not need to be low density to avoid adverse effects upon the wider Green Belt.

3. Lives and Landscapes Assessment for Rossendale Borough Council (July 2015)

The study and its aims

- 3.1. 'Lives and Landscapes Assessment' contains landscape appraisals of all sites which 'have potential landscape sensitivity within the Borough'. The sites include those identified by both the Council and potential developers.
- 3.2. The Assessment draws conclusions for each assessed site, concluding that a site is either:
 - Undevelopable area;
 - Developable area with mitigation;
 - Developable area.
- 3.3. Within the 'Lives and Landscapes Assessment', the site at Market Street, Edenfield is assessed as part of a larger parcel of land called *'land east of the motorway Edenfield'*. This land parcel includes the Taylor Wimpey site in the north, a small parcel of land associated with the former Horse and Jockey pub on Market Street, the recreation ground to the south of the Taylor Wimpey site, and the grass field to the south-west of the Taylor Wimpey site. The sub-parcels of the site are referred to as areas A-D in the Assessment.
- 3.4. The Taylor Wimpey site is referred to as areas A and C.

Landscape character types

- 3.5. The report generally considers the landscape context of Rossendale as set out within Lancashire County Council's Lancashire Landscape Strategy, which locates Edenfield and its surroundings (including the site) within a landscape character type referred to as 'The Settled Valley', however the Assessment considers that this landscape character type is not an accurate description of the landscape of the southern section of the Irwell Valley between Rawtenstall and Edenfield *'which is more rural in nature and importantly has little or no development in the valley bottom'*. The Assessment therefore introduces a new Settled Valleys character area, referred to as '8b Irwell Valley south', the relevant characteristics are summarised as:
 - The valley opens out and the profile of the lower valley sides becomes less steep;
 - The density of housing and industry becomes much less, with extensive areas of open pasture and woodland within the valley bottom;
 - Some ribbon development continues along the main roads but it is not continuous;
 - There are views across the valley which are predominantly rural in character with a lesser proportion of the view being made up of built development; in some places long views to the surrounding hills and moorland reinforce the South Pennine Rural character.

The report conclusions in respect of the site

- 3.6. The Assessment concludes that the majority of the Taylor Wimpey site, referred to as Area A is *'not suitable for development on landscape grounds'*.
- 3.7. The recommendations state that the site is 'unsuitable for development, because the effects on the landscape would be significant, and would be uncharacteristic of the local landscape character area, 8b Irwell Valley south. Nor could it be effectively mitigated against because of the sites openness. Long views west from Burnley Road and eastwards from the far side of the valley would be affected and there would be significant adverse effects on attractive well used walks in the area. In addition a visually prominent and well kept sports field would be destroyed.'
- 3.8. The Assessment's description of the landscape context of the site places strong emphasis and value on openness and ribbon development in the area around the site, however we consider that in the wider context, appropriate development on the site would extend the existing nucleated settlement at the south of Edenfield in a logical northward manner, which is constrained by a strong established western boundary in the form of the A56 dual-carriageway.
- 3.9. There would be a reduction in the extent of ribbon development along Market Street/ Burnley Road, however this would result in substitution of one existing characteristic which is already present in the landscape for another. Some ribbon development would remain in the northern part of Edenfield, however it is questionable how much value should be placed on ribbon development as an urban form, which is essentially urban sprawl and is not currently promoted as good design.
- 3.10. The existing sports field mentioned in the recommendations is not part of the proposed Taylor Wimpey site and would not be affected by this development.
- 3.11. Good design principles incorporated into the masterplan, as presented within the submitted Development Statement, would ensure that:
 - long views across the valley to the west from Market Street and the Public footpaths within the site can be retained through appropriate placement of open space and consideration of building scale within the development;
 - intrusive noise of the A56 can be reduced through acoustic screening and landscape buffer treatments, effectively improving the quality of existing public routes through the site;
 - existing Public Rights of Way through the site are retained on their current alignment and set within an attractive, high quality setting, and that these routes are supplemented by additional public routes to maintain the accessibility of the site and enhancing its recreational value;
 - existing valued features of the site, such as dry stone walls, are retained as features within the proposed development;
 - new landscape treatments along the western site boundary can strengthen the western

edge of Edenfield and the interface with the Green Belt, softening eastward views to the development from the wider landscape.

- 3.12. There would be some loss of openness as a result of development, as would occur with the development of any green-field site, however the resulting developed character of the site would not conflict with its surroundings and would become an extension of the urban form which already exists in the southern part of Edenfield. In the broader context of the site, development would not extend the developed area any higher up the valley sides than already exists along Market Street, nor would development extend into the undeveloped River Irwell valley, which is located to the west of the A56 dual-carriageway.
- 3.13. We therefore consider that mitigation, in the form of good design principles as outlined above, can reduce the potential adverse effects of development upon landscape character and views to an acceptable level, and that the Assessment should conclude that the site at Market Street, Edenfield is suitable for development with appropriate mitigation.

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