

# Rossendale Local Plan Examination

## MATTERS, ISSUES AND QUESTIONS (MIQs)



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

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

#### **H72 – Land west of Market Street, Edenfield**

#### **Policy HS3: Edenfield**

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

14.1 The response to the Inspector’s Preliminary Question 10 sets out a summary of the assessments undertaken for H72, including the conclusions from the Landscape Study. This is repeated in Table 1 below for ease of reference.

14.2 The landscape study relating to H72 was based on the four SHLAA<sup>1</sup> (EB004) sites that make up the allocation but further breaks these down into six parcels. Four of the parcels are considered suitable for development on landscape grounds (which includes the Horse and Jockey site which already has permission for ten dwellings and is under construction). Two of the parcels, including the main central part of H72 between the A56 and Market Street, have been assessed in this study as not suitable for development on landscape grounds. Table 1 below shows the SHLAA reference and the corresponding Landscape Study references and conclusions.

Table 1: Landscape Study conclusions for H72

<b>SHLAA Reference</b>	<b>Description</b>	<b>Landscape Study reference</b>	<b>Landscape Study conclusion</b>
SHLAA16256 Land between Blackburn Road and A56, Edenfield	Triangular piece of land to the north of the site, bounded by Blackburn Rd, A56 and Church Lane	Blackburn Road (bottom half of SHLAA16256)	Not suitable for development on landscape grounds
		Pinfold - Area A (top half)	Site suitable for development with mitigation
SHLAA16262	Main central part of	Land East of	Not suitable for

<sup>1</sup> Strategic Housing Land Availability Assessment

Land west of Market Street, Edenfield	the site between Market St. and the A56, north of recreation ground and Chatterton Hey/Heaton House	Motorway - Area A (largest part of site surrounding Mushroom House)	development on landscape grounds
		Land East of Motorway Area C (small area at top, to west of Pack Horse Farm)	Site suitable for development with mitigation
SHLAA16263 Land off Exchange Street, Edenfield	South-western part of the site, to the east and south of Chatterton Hey/Heaton House	Land East of Motorway - Area D	Site suitable for development with mitigation
SHLAA16358 Horse and Jockey Hotel, 85 Market Street, Edenfield	Small piece of land adjacent to Market St. on former public house site with planning permission for 10 dwellings; site is currently under construction	Land East of Motorway - Area B	Site suitable for development

14.3 Whilst the Landscape Study concludes that a large part of the site is not suitable for development on landscape grounds, a detailed representation has been submitted as part of the Regulation 19 consultation<sup>2</sup>, stating that this assessment should be amended to state that the site is 'suitable for development with appropriate mitigation'. The representation includes its own landscape assessment which sets the site in a wider landscape context and concludes that: "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".

14.4 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."

14.5 It goes on to set out a number of mitigation measures relating to landscape, including the following:

- 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;

<sup>2</sup> see Pegasus Group on behalf of Taylor Wimpey in Appendix 4 of [SD010](#)

- The steep landform in the north west of the site which is unlikely to be suitable for development could accommodate new woodland planting to assist in assimilating the development into the landscape;
- The protection of the amenity value of the existing public right of way and Mushroom House and retention of the stone walls and vegetation around Mushroom House;
- 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;
- Integrate tree planting throughout the development to break up the roofscape and embed the development into the landscape.

14.6 Landscape is one of a number of issues to consider in the overall planning balance. However, the Council considers landscape and visual impact can be adequately mitigated as outlined above.

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

*Is the scale of the proposal consistent with the development hierarchy and the sustainability of its village location?*

14.7 As set out in Matter 2, according to the criteria used to define the settlement hierarchy, Edenfield could be classed as a Local Centre. This is based on it having relatively good public transport links, for example it is located along the route of an express bus. It also possesses a primary school and a community centre. However, the Local Plan proposes a large number of residential units for allocation and it is expected that these will come forward quickly should the site be allocated in the adopted Local Plan, given the level of developer interest. Therefore, in order to reflect the amount of growth proposed in the Local Centre, Edenfield has been assigned to a specific category entitled 'major sites'.

14.8 The additional housing proposed in Edenfield is considered to provide an opportunity to support the sustainability of the location. This could be achieved by bringing in new residents who may make use of existing facilities which will help local businesses, as well as encouraging the provision of new or enhanced facilities. It will also provide an opportunity to provide affordable housing in the area, as well as enhancements to public transport and other public services such as education.

*What proportional growth does it represent for Edenfield?*

14.9 As set out in Table 1 of Question 15 of the Inspector's Initial Questions ([EL1.002k](#)), the total number of dwellings expected to be delivered in the Borough between 2019-34 is 3,046 (not including the small sites allowance). H72 is proposing 400 dwellings so this would represent around 13% of total growth. Within Edenfield itself, total growth has been identified as 466 additional dwellings, made up of the proposed allocations and other committed

sites (which already have planning permission). H72 would represent around 86% of this growth.

*What effect would the scheme have on the function, form and identity of the village?*

14.10 The Council acknowledge that H72 represents a significant increase to the existing urban area of Edenfield. However, the requirements set out in policy HS3 and any agreed masterplan will ensure that a high quality development which reflects the character of the location and is sensitive to its surroundings.

14.11 The development will be phased over time which will mean change will take place evenly, allowing the new development to establish itself relatively slowly, rather than swamping the village with a large amount of development all at once. A Phasing and Infrastructure Delivery Schedule will also be required.

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

*What effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it?*

14.12 The Green Belt Study ([EB022](#)) identifies land parcels as potentially suitable for release in 'Green Belt' terms with a view to informing the identification of potential site allocations in the Green Belt, it does not assess the harm of releasing specific sites from the Green Belt designation. Consequently, there is no assessment of the release of H72 in its entirety. However, all the land within Site H72 was assessed across three parcels (39, 43, 44).

14.13 The conclusions of these three assessments are set out in Table 4.4 in Chapter 4 of the Study (Submission Document EB022), which provides detailed commentary on potential harm resulting from release of land parcels, with reference to performance against the Green Belt purposes, the implications of release on neighbouring Green Belt and any associated boundary issues.

14.14 In summary, the study found that the release of the three land parcels (39, 43, 44) would result in a medium degree of harm in 'Green Belt' terms, and highlighted potential for release in all three locations. Appendix 1 provides a summary table of the Green Belt Study findings for H72

14.15 The large site at Edenfield is considered to be a strategic allocation that with application of masterplanning principles can be implemented in such a way as to minimise impacts on the wider Green Belt.

*Does the assessment in the Council's Green Belt Review give appropriate recognition to the site's strategic role in preventing the unrestricted sprawl of Manchester?*

14.16 Yes. Paragraphs 3.20 to 3.28 of the Green Belt Study [EB022](#) defines the key terms and features used to assess the contribution of Green Belt to Purpose 1. The detailed criteria used to assess contribution to Purpose 1 are set out in Table 2.1. These assessment criteria are consistent with those used in the Greater Manchester Green Belt Study, which defined the large built-up area as the visible continuous urban mass that stretches across all of the 10 metropolitan authority areas.

14.17 As Rossendale does not have a large built up area, it is only those parcels within Rossendale that abut the 'large built-up area' of Greater Manchester have been considered under Purpose 1 for this study. This includes parcels that lie adjacent to the built up areas of Stubbins, Edenfield and Whitworth. Consideration of the contribution of land within the site to Purpose 1 has therefore been taken into account.

14.18 The analysis in Table 4.4 in Submission Document EB022 identifies potential sprawl as an important consideration for parcels 39, 43 and 44, but considers the containment of the three parcels between the A56 and existing inset linear development along Market Street to be the key factor in limiting the extent to which northward expansion of Edenfield in this location would harm the integrity of the wider Green Belt.

*What are the exceptional circumstances that justify altering the Green Belt in this case?*

14.19 It is clearly reported in the Green Belt Study (for example paragraph 5.7 of Submission Document EB022) that performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. The exceptional circumstances which are considered to exist for the release of Green Belt for housing and employment development are set out in the Green Belt Topic Paper ([EB023](#)). This concludes that the importance of having a balanced housing and employment supply in a District with challenging geography and viability issues in the east of the Borough has influenced the approach to release of Green Belt land. This is especially given the need to identify land to accommodate 3,180 dwellings over the next 15 years which could not be satisfied without the release of existing Green Belt land. Each Green Belt release is exceptionally justified by the vital need to secure enough housing, especially affordable housing, the widespread constraints on viability arising from low land values and Infrastructure constraints, especially those arising from flooding and highways, coupled with the objective of avoiding development on areas of attractive landscape?

14.20 The exceptional circumstances are also re-iterated in the explanatory text for Strategic Policy SD2 (Urban Boundary and Green Belt). In relation to H72, in particular, further justification is as follows:

- It is located in the popular south west of the Borough where there is high demand;

- Given the substantial number of houses proposed in the East of the Borough the site helps to ensure a balanced supply between the east and west of the Borough;
- The site is large enough to ensure a mix of housing types and sizes, including affordable provision in an area of the Borough where affordability ratios are highest;
- The large scale of the site also ensure that a masterplan will be necessary which provides an opportunity to create a high quality, well designed scheme;
- It is important that past under delivery is addressed within the Local Plan and a supply of attractive sites provided which are attractive to the market. As many of these areas are currently constrained by Green Belt designation it is important that some Green Belt release is considered as part of a balanced portfolio of sites that can reverse this trend;
- There is a willing landowner/developer involved so the dwellings proposed would be deliverable.

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

14.21 This requirement is considered to be justified as it reflects paragraph 138 of NPPF which states "...Where it has been concluded that it is necessary to release Green Belt land for development, plans...should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land".

14.22 The detailed mechanism for how this requirement will be implemented would be developed through the Masterplan process for relevant sites or in a relevant SPD.

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

14.23 In their representation, Taylor Wimpey indicate they are largely in agreement with the phasing and infrastructure delivery schedule set out in HS3. The format this schedule will take and how it will be monitored and implemented will be developed once the allocation has been adopted and through the wider masterplanning process.

Infrastructure Delivery Plan (IDP) Update 2019 ([SD014](#))

14.24 The IDP states that LCC as local highways authority receives block grant funding from government to support local transport infrastructure

improvements. In 2018/19 and 2019/20, Lancashire County Council will receive £6.054 million per year in integrated transport block funding, to fund capital schemes on the local road network up to the value of £5 million per scheme. LCC also prepares a local transport plan which sets its priorities for improving transport in the county. RBC as local planning authority can secure funding from developers through the Section 106 process to make transport improvements required as a direct result of development.

14.25 The IDP has identified road improvements at Rochdale Road / Market Street roundabout in Edenfield as an infrastructure scheme associated with the delivery of the Local Plan. The cost is shown as unknown at this stage but potential delivery mechanisms have been identified as being through LCC, Department for Transport, Local Prosperity Fund, HIF (or replacement) and Section 106 requirements.

#### Highway Capacity Study ([EB040](#))

14.26 The Highway Capacity Study identifies the 3 arm mini roundabout located in north Edenfield for consideration. The roundabout connects Bury Road, Rochdale Road and Market Street. The results in the study demonstrate that provision of a formalised signalised crossing could provide some benefit to the operation of the Bury Rd South arm of the junction, particularly during the evening peak when delay is noted to be at its worst. Any further mitigation solutions considered valid for this junction should only be determined in consultation with LCC, given the extremely land locked nature of the junction and its proximity to a number of residential units.

#### Highway England's latest position

14.27 Highways England's (HE) latest position is set out in their letter to the Council dated 25<sup>th</sup> January 2019. This is reproduced in submission document [SD011](#) which includes additional comments to the Local Plan. The conclusion of the letter is that HE is now satisfied, in principle, that the emerging Local Plan site allocation H72 could be developed for housing without adverse impact upon the A56 trunk road, provided that a careful approach is taken to its planning and construction. The following is a summary of the further detail set out in this letter:

- Since HE's letter of 4<sup>th</sup> October 2018 (in response to the Regulation 19 consultation), which set out concerns regarding the impact that H72 may have on the stability of earth cuttings on the A56 and the absence of a detailed ground investigation survey, RBC engaged with HE on these matters;
- HE note that the part of the allocation to the north of Blackburn Road, situated an area which has current issues with landslip, has been removed and HE strongly welcomes this change;
- HE have now considered the revised site allocation masterplan and other information that was submitted to them by consultants working on behalf of the 3 landowning interests of the site, as well as studying their own geotechnical records;

- HE has advised that, for housing, special attention needs to be taken to building foundations and they underline the need for a high level of caution and technical awareness in any scheme to avoid causing instability or damage to the A56;
- HE recommends a comprehensive site survey and geotechnical assessment is carried out before planning decisions on the development layout (and therefore quantum of development) are taken;
- Development needs to be considered and managed correctly to avoid triggering further land slippage along the A56;
- Overall, HE are content that, in principle, the indicative layout outline within the submitted masterplan would be unlikely to cause instability to our asset provided that the development layout, earthworks (e.g. land regrading), site drainage and construction operations are suitably designed, planned for and executed – this would make it possible to engineer out the risk of geotechnical problems; HE provide a list of criteria that they would expect.

14.28 HE note that the Local Plan Highway Capacity Study refers to there being a future need to widen the adjoining section of the A56; this is something HE are aware could be needed towards the early 2030s; they have no proposals at this time, but has the right to do so in the future. In theory, as a scheme could be completed within only 10 years of any future dwellings being occupied, RBC and any future developer(s) of the H72 site may wish to consider this when planning the permanent internal layout and landscaping of a 'new' development.

LCC Highways latest position:

14.29 LCC Highways state that each land parcel within H72 should be linked to provide maximum permeability in accordance with Manual for Streets; if brought forward piecemeal, the site should be designed with future connectivity in mind. Comment on the different land parcels are as follows:

- Land to south of Blackburn Road – Access and visibility splay onto Blackburn Road appears achievable. Improvements at Pinfold junction to include signalised pedestrian provision and changes to speed limit on Blackburn Road are likely to be necessary;
- Land east of Market Street (around Mushroom Farm) – site access between Horse and Jockey and 115 Market Street appears achievable. Consideration for existing on-street parking generated by residents of Market Street should be made and off-street parking created within the site should be provided if necessary;
- Land north of Exchange Street – access to Market Street (north of Horse and Jockey) via above parcel (land east of Market Street) is required together with secondary access from Exchange Street and Highfield Road to Bolton Road North. The mini roundabout at the junction of Market Street and Rochdale Road, Bury Road will be assessed in the highway capacity study.

14.30 LCC's further comments on Junction 11 - Rochdale Road / Market Street / Bury Road, Edenfield are as follows: LCC suggest that a mitigation proposal should be developed for the junction to facilitate Local Plan traffic. Alternatively the quantum of development should be reduced and modelling undertaken for the junction to identify the amount of development which can realistically come forward based on the existing junctions operation (or a hybrid of the two). I would suggest in order to be thoroughly robust the model should assume 100% distribution through the junction.

*Has any necessary third party land been secured for access?*

14.31 No third party land is required.

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

*What scale and form of additional primary school provision would be needed to support the development?*

Infrastructure Delivery Plan (IDP) Update 2019 ([SD014](#))

14.32 The IDP identifies that the development proposed at Edenfield may require either a school extension or a new school, the latter of which would cost in the region of £4 million. A standalone new primary school would be a Free School and would not be maintained by the education authority.

- It is likely that new classrooms will be required in the plan period. LCC will initially seek to expand existing school buildings, that may have the physical capacity to expand.
- Financial contributions from developers will be required to accommodate demand from new housing.

LCC Education:

14.33 Lancashire County Council School Planning Team (SPT) advises that the site should include, as a minimum, a 1 form entry school with the location of this to be defined in the masterplan. They state that the masterplan, phasing and bedroom mix will enable the SPT to understand the point of need.

14.34 LCC state that the expansion of existing schools is still a preferred choice recognising the infrastructure and management already in place. If a school does not have existing land to facilitate expansion, options of adjacent land could be identified with assistance from the Local Planning Authority (LPA). If this is not possible LCC would look to the LPA for land with the ability to provide a new minimum 1 form entry primary school in the area of need.

*Is an expansion of Edenfield Primary School justified, deliverable and consistent with the Green Belt status of the land?*

14.35 The expansion of the existing school is considered to be justified as demonstrated in the commentary above. The existing Edenfield Primary School buildings are located immediately adjacent to the Green Belt, with the school playing fields being within the Green Belt itself. If any expansion of the school

necessitated development in the Green Belt, this would need to be considered under para.s 143 and 144 of NPPF which relate to “very special circumstances” for construction of new buildings in the Green Belt.

*If a new school is required, is there scope to accommodate this within the proposed allocation site, or elsewhere? What impact would on-site provision have on housing capacity? What provision is required for early years/childcare and secondary education facilities? What is Lancashire County Council’s latest position?*

14.36 Taylor Wimpey have commissioned an Education Report, which is set out in their representation (see SD010 [Appendix 4](#)). This states that, based on the level of future need, expansion is likely to be more appropriate than a new facility and could be funded through Section 106 contributions. Due to the number of pupils this development is expected to generate, and the cost implications of the projects, it would make most sense to expand existing provision. This would also remove the need for land to be provided on this development, much of which would need to be purchased by LCC at full market value.

14.37 LCC state that, at the present time, the SPT are not actively seeking a new site for primary or secondary schools. However, in the case of the strategic site at Edenfield in the Ramsbottom planning area, the proposal would have a significant impact on the immediate schools. The SPT welcome the earliest opportunity to engage in the process of master planning process to ensure the financial contributions are secured through s106 agreement.

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

14.38 The site already benefits from the large amount of preparatory assessment and investigation undertaken by the proposed developers. Any infrastructure provision needed to support the development, identified through policies set out in the Local Plan, will be addressed through the required masterplan for the site.

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

14.39 Following Highway England's response to the Regulation 19 consultation, in which they raised a number of concerns relating to geotechnical matters, a meeting was held in December between the three landowners / developers, the Council and Highways England to consider these issues. The developers were asked to submit details of their technical studies for Highway England's consideration. Highways England then wrote to the Council (25th January) confirming that:

*"Overall, we are content that, in principle, the indicative layout outlined within the masterplan drawing ..... would be unlikely to cause instability to our asset provided that the development layout, earthworks (e.g. land regrading), site drainage and construction operations are suitably designed, planned for and executed. That way, it is possible that the risk of geotechnical problems within the site can be engineered-out...."*

Highways England are therefore no longer expected to object to site allocation H72 though would expect that a comprehensive (and intrusive) site survey and geotechnical assessment is carried out before planning decisions affecting the development layout (and therefore quantum of development) are taken. They further recommend a number of mitigation measures for the detailed design stage, summarised below:

- Be based upon a comprehensive site ground investigation survey and geotechnical assessment incorporating new ground investigation and borehole surveys.
- Submit plans for all earthworks and drainage in the vicinity of the A56 boundary
- Avoid loading land adjoining the A56
- Show that the natural form of the slopes within the site along the A56 boundary around the head of Great Hey Clough and along the boundary with the adjoining A56 embankments either remain undisturbed or their stability is improved
- Demonstrate how both the culverts of the Great Hey Clough watercourse and unnamed brook to the south west of the site (which pass under the A56), together with our A56 embankment toe-drainage apparatus, will be protected from damage and blocking-up during construction
- Avoid the use of sustainable urban drainage systems (SUDS) within the site along the boundary with the A56, as indicated in the masterplan

14.40 Highways England is aware of a future need (towards the end of the Local Plan period in the early 2030s) to widen the adjoining section of the A56 to three lanes in each direction. Although there are no proposals at this time, Highways England has the right to do so in the future and suggested that "any future developer(s) of the H72 site may wish to consider this when planning the permanent internal layout and landscaping of a 'new' development".

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

14.41 The SHLAA 2018, Heritage Impact Assessment ([EL1.002g](#)), Strategic Flood Risk Assessment 2016 ([EB032](#)) and consultation responses from statutory consultees such as Highways England and LCC Highways (see Regulation 19 responses [SD010](#)) have provided detailed information about various constraints and development considerations. The scale of the development site will inevitably mean that mitigation measures will be necessary to address identified constraints. Policy HS3 provides a detailed list of considerations and further investigation, including the identification of appropriate mitigation measures, is expected through the planning application and masterplanning process.

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

14.42 The net developable area of 15.25 shown against H72 in the table in policy HS2 was based on the original gross site area of the site, as shown in the Regulation 18 version of the Local Plan. The site was reduced in size for the Regulation 19 version of the Plan and the Council acknowledges that the net developable area should actually be 13.74 hectares, based on the current gross site area of 23.19. This change has been reflected in the revised housing trajectory prepared in response given to Question 13 of the Inspector's Initial Questions (Appendix B [EL1.002jiii](#)).

14.43 In relation to the potential future road widening on the A56, this was not specifically taken into account when identifying the net developable area. However, as set out in the comments summarised under part e) above, Highways England are aware of this and it is the Council's understanding that they have been in discussion with the proposed developer regarding this. The Council are not aware that this would lead to a reduction in the site capacity.

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

14.44 The Council are not aware that the constraints and infrastructure provision required would lead to a reduction in site capacity.

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

14.45 The Combined Illustrative Masterplan reflects the current site allocation boundaries as shown on the submission Policies Map ([SD003](#)). The Masterplan shows the indicative layout for the land within control of the owners

of the middle and lower sections of the site. The northern boundary of the site is in the ownership of a different landowner. This northern section will also be developed as part of the overall scheme and the Council will require the different landowners to work together to provide an appropriate masterplan for the whole site.

14.46 The Masterplan has not been prepared by the Council so it is unable to provide accurate gross or net site areas.

**m) Is the site available and deliverable in the timescales envisaged?**

14.47 Subject to the land being released from the Green Belt through the Local Plan, the Council considers the site to be available and deliverable in the timescales envisaged. The land is under the control of willing landowners / developers who are already progressing site investigation and preparatory work in anticipation of submitting a planning application for residential development.

**The general questions below apply to all of the sites within Matter 14 and the answers will correspond with the respective letter. This excludes H72 which has been covered above.**

**The additional specific questions raised by the Inspector in the MIQs document for certain site allocations will be set out under the relevant site allocation.**

### **General Questions**

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

**b) Is the proposed site capacity appropriate, taking account of constraints and the provision of necessary infrastructure?**

**c) Is the site available and deliverable in the timescales envisaged?**

**d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?**

14.48 The following commentary has been informed by evidence such as the SHLAA 2018 ([EB004](#)), the Heritage Impact Assessment ([EL1.002g](#)), Strategic Flood Risk Assessment 2016 ([EB032](#)), Landscape Study ([EB025](#)) and responses from consultees such as Highways England and LCC Highways (see Regulation 19 responses [SD010](#)). These have provided information on constraints and, if identified, potential mitigation. Further information provided as part of a planning application has also been used where relevant.

14.49 If the Inspector deems it to be appropriate, further detail could be provided on those sites where specific constraints and/or mitigation has been identified (if these are considered to necessitate specific guidance). This could include a site plan and a brief summary of considerations and could be prepared for relevant sites as a Main Modification.

14.50 For any sites in the Green Belt, the exceptional circumstances which justify their allocation are set out in the Green Belt Topic Paper [EB023](#).

### **H70 – Irwell Vale Mill, Irwell Vale**

14.51 The response to the general questions for this site are as follows:

- a) The Strategic Flood Risk Assessment identified significant Flood Risk with this site and that the Exceptions Test should be applied. However, the Environment Agency support the development of the site as demolition of the Mill would create the opportunity to reconfigure the River Ogden at

this point and reduce overall Flood Risk in Irwell Vale. Further details are set out in the Flood Risk Topic Paper ([EB033](#)).

- b) The site capacity of 45 dwellings is considered appropriate for the site.
- c) The site is considered to be available and deliverable in the first five years of the Plan period.
- d) The Green Belt Study (Parcel 33) recommended that this parcel could be released subject to suitable design and strengthening planting. Good landscaping would create the opportunity to create an enhanced entry into the Conservation Area. The site is partially previously developed land.

### **H71 – Land east of Market Street, Edenfield**

14.52 The response to the general questions for this site are as follows:

- a) The SHLAA 2018 considered the site to be suitable. It is a brownfield site where redevelopment for residential is an opportunity to enhance the local character of the area. The site is currently within the Green Belt. Vehicular access would need to be approved by LCC Highways.
- b) The site capacity of nine dwellings is considered appropriate.
- c) The site is available for development and is now considered developable in years 6-10 of the Plan period. This is a change from the timescale identified in policy HS2.
- d) The site is currently within the Green Belt and forms a small part of the wider Green Belt parcel which was assessed in the Green Belt Study. Whilst the study recommended that the parcel overall was not suitable for release, the brownfield nature of the site, its small scale and the opportunity to enhance a currently untidy area of land is considered to justify release.

### **H73 – Edenwood Mill, Edenfield**

14.53 The response to the general questions for this site are as follows:

- a) The SHLAA 2018 considered the two sites which make up the overall allocation to be suitable.
- b) The site capacity of 47 dwellings is considered to be appropriate. The site is partly brownfield and provides a conversion opportunity. A density of 50 dpa has been applied to make the most efficient use of land.
- c) The site is considered available and developable in the timescales envisaged (years 6-10).
- d) Edenwood Mill is an existing though dilapidated building in the Green Belt so its development could be acceptable in Green Belt terms. The wider

area (Green Belt Study Parcel 49) does not recommend release of the area for housing though the landscape study considers release of this particular area would be acceptable.

### **Specific Questions:**

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

14.54 Land to the east of Edenwood Mill (south of Wood Lane) is not within Rossendale Borough Council's area, it is within Bury. Consequently, the Rossendale Green Belt Study did not consider the potential to release Green Belt land in this location. The Council are not aware of plans for Bury Council to release land in this area. Land to the north-east (north of Wood Lane) is within the current Green Belt. The Council's objective has been to minimise the loss of Green Belt as much as possible and the land also forms part of parcel 49 which has not been recommended for release in the Green Belt Study. Whilst Edenwood Mill is also within this parcel, its release can be better justified as it is a brownfield site.

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

LCC's latest position:

14.55 Proximity of site access to J1 M66 and visibility splay requirements for actual road speed (40mph speed limit) Wood Lane are a concern. The development of the site limits the possibility of a southbound on slip road onto the M66 at J1.

14.56 The Council are not aware of any current or future proposal to create a slip road onto the M66 in this area.

### **H74 – Grane Village, Helmshore**

14.57 The response to the general questions for this site are as follows:

- a) The 2018 SHLAA considers the site to be suitable for housing. The owner of the larger part of the proposed allocation (Taylor Wimpey) undertook pre-application consultation with residents in June 2019. A planning application has been submitted for 131 dwellings and is currently under consideration by the Council.
- b) The planning application currently under consideration does not include the entire site area so additional capacity remains on the wider allocation. Until such time as this is determined, it is considered to keep the site capacity as 174.
- c) The site is considered deliverable in the timescales envisaged (years 1-10). It is largely within the ownership of a major housebuilder who has submitted a planning application for the site.

### **Specific Questions:**

- i) What is the nature of the surface water flooding risks on the site? Can this be mitigated?**

14.58 The area at high risk of surface water flooding has been excluded from the area available for development, but since the site is over 1ha, a flood risk assessment is recommended. Any flood risk will be addressed through the planning application process.

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

LCC Highways latest position:

14.59 Suitable access is achievable but not from Grane Road due to amenity issues, on-street parking and highway safety issues. Access should be at Holcombe Road only. Some pedestrian provision necessary on Grane Road for access to PT. Impact of development traffic on Holcome Road and Grane Road, mitigation measures should look at improvements to the junction to make the area safer, and include a speed limit review.

14.60 The above comments are in relation to the principle of the allocation. LCC will provide further consultation responses to any planning applications submitted for the site, including the current one under consideration.

## Appendix 1

Table 1: Green Belt Study findings for H72

Green Belt Parcel ref. no.	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4	Commentary on Green Belt Performance
39 (top triangle)	Moderate	Moderate	Weak	Moderate	No Contribution	Although this parcel does not perform strongly against purpose 1, its release would not relate well to the existing settlement form and would introduce an element of sprawl to the north-western edge of Edenfield and along the B6527 (Blackburn Road). However, it is considered that the strategic release of the neighbouring parcels P44 and P43 to the south, before parcel P39 may not be perceived as sprawl as the development would be contained by a strong boundary (the A56), which would limit the potential for future sprawl. The planned release of parcel P44, P43 and P39, in that order, could be perceived as the main block of settlement within Edenfield growing incrementally north and filling the gap between the A56 and the linear settlement along Market Street. This could create a stronger Green belt boundary and settlement edge.
43 (middle section)	Moderate	Moderate	Weak	Moderate	No Contribution	Although this parcel does not perform strongly against purpose 1, its release would not relate well to the existing settlement form and would introduce an element of sprawl to the north-western edge of Edenfield. However, it is considered that the strategic release of the neighbouring parcels P44 to the south, before parcel P43 may not be perceived as sprawl as the development would be contained by a strong boundary (the A56), which would limit the potential for future sprawl. The planned release of parcel P44 and then P43 would be perceived as the main block of settlement within Edenfield growing incrementally north and filling the gap between the A56 and the linear settlement along Market Street. This could create a stronger Green belt boundary and settlement edge.

44 (SW section)	Moderate	Moderate	Weak	Weak	No contribution	The A56 dual-carriageway defines the western boundary forms a strong barrier feature to prevent the possible outward sprawl of development. The northern boundary of the parcel comprises an access road and dry stone wall and does not form a strong defensible barrier to prevent the outward sprawl of development. The parcel contains little urban development, although the presence of the A56 and adjacent urban edge has weakened its rural character. Its release is unlikely to have a substantial negative effect on the function of neighbouring parcels under purpose 3. Releasing this parcel is unlikely to have a substantial negative effect on the integrity of the wider Green Belt.
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The Green Belt Study considers the potential degree of harm caused by release of the three parcels is considered to be medium.