



**Edenfield Community Neighbourhood Forum
Rossendale Regulation 19 Local Plan Examination**

30th August 2019

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?**

Response:

The '[Lives and Landscapes](#)' Assessment for Rossendale Borough Council' (2015), prepared by Penny Bennett, preceded the current emerging Local Plan. As referred to in ECNF's representations at pre-submission Plan stage, a large proportion of land in residential allocation H72 was assessed as part of that research and was considered unsuitable for development on landscape grounds.

When also factoring in the impact of the loss of the site on openness and its large-scale residential development eroding the permanence of the Green Belt, the proposed allocation H72 should not be pursued due to its detrimental impact on local landscape.

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

Response:

ECNF's Statements on other Matters confirm that the proposal is out of scale with the character of Edenfield – which is not even a named village within the Plan's defined development hierarchy. The housing allocation for Edenfield is entirely disproportionate, as it represents growth of 47% in comparison with 10% growth for the Borough as a whole. 87% of the housing proposed on land to be removed from the Green Belt is in Edenfield. This scale of development in a Green Belt location will physically alter the village's linear form, effectively creating suburban sprawl moving westwards – entirely counter to Green Belt purposes.

There are already significant infrastructure issues in Edenfield: local roads and the strategic road network are congested at peak times, and the primary schools are close to capacity. There is no doctors' surgery and no secondary school either. It is clear that adding a total of 456 new homes – with no provision being specifically made for new or enhanced social infrastructure - in these circumstances would completely alter the character of the village to its detriment.



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

Response:

ECNF's view is that having been based on the [2016 Green Belt Review](#), which is considered to be unreliable and insufficiently robust, the site's removal from the Green Belt and its residential allocation will undermine the remaining Green Belt's purposes. In particular and with reference to para. 134 of the NPPF, the site currently helps to 'check the unrestricted sprawl' of the Manchester conurbation (a), assists in 'safeguarding the countryside from encroachment', preserves the setting and special character of the historic village of Edenfield (d); and it remaining undeveloped would 'assist in urban regeneration, by encouraging the recycling of derelict and other urban land'(e).

In answer to the second question, as one example of the repercussions of Green Belt removal being based on flawed research, appropriate recognition was not given to the site's strategic role in preventing the unrestricted sprawl of Manchester in the Green Belt Review. With regard to the NPPF para. 134 a), the Review only considered parcels in settlements which abut the large built-up area of Greater Manchester in relation to urban sprawl. The analysis included the land making up site H72 (it scored 'Moderate' both in terms of whether the land had already been affected by sprawl, and whether there was potential for sprawl to occur). Clearly the areas which were assessed in relation to checking sprawl are more 'at risk', given their proximity to the large built-up area of Greater Manchester, yet the Review did not weight this and each of the other purposes considered for different sites, to reflect the relative importance of different purposes in different locations.

It is also of concern that the A56 should be considered by RBC to be a suitable, new boundary to the Green Belt at Edenfield. In the context of any Green Belt review having to have regard to the new boundary's '*intended permanence in the long term, so they can endure beyond the plan period*' (NPPF, para. 136), ECNF does not consider that the A56 would form a boundary consistent with national policy. The Green Belt Review considered that '*the A56 dual-carriageway defines the western boundary and detracts from the sense of openness in parts*'. The A56 'boundary' is also referenced in the assessment in relation to safeguarding the countryside from encroachment. Whilst an aerial view might suggest that the A56 forms a boundary, the reality on the ground - due to topography and key public views - demonstrates that this is not the case, as the road is in a cutting, giving uninterrupted views of the open countryside westwards from Market Street.

Thus the potential for the site to help prevent the unrestricted sprawl of Manchester was not considered accurately, nor was it a factor properly taken into consideration in the findings of the Review.

In reply to the third question and from the submission Plan, its evidence base and ECNF's own research and analysis, ECNF has concluded that RBC has not identified any exceptional circumstances that would justify Green Belt release in Edenfield. It is evident that the Council has simply undertaken a Call for Sites, using a Green Belt Review to justify the release of extensive Green

Belt land put forward for development by owners/ prospective developers. Despite the housing requirement subsequently being reduced, no update has been undertaken to reconsider whether the removal of land from the Green Belt was still necessary or appropriate.

ECNF considers that the evidence base as it stands for the Plan does not justify removing any land at Edenfield (or elsewhere) from the Green Belt. There is nothing in the evidence base to demonstrate that the Council has *'examined fully all other reasonable options for meeting its identified need for development'*, including making as much use as possible of suitable brownfield sites and underutilised land, optimising density, and discussing with neighbouring authorities about whether they could accommodate part of the Borough's identified development needs (NPPF, para.. 137). The lack of accurate evidence - and the absence of any evidence of exceptional circumstances - renders the Council's approach to/ policies for Green Belt change unsound in the context of national policy.

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

Response:

These questions are primarily for RBC to answer in detail. Policy HS3 c) states that a phasing and infrastructure delivery schedule for Edenfield's site H72 *'shall include'*:

"Identification of mechanisms to enhance the quality of, and access to, Green Belt land in the area between the development site and Rawtenstall/Haslingden."

Policy SD2 states that for the sites removed from the Green Belt for development:

"...Development will also be expected to contribute to compensatory improvements to land elsewhere in the Green Belt, enhancing both its quality and public access."

ECNF would however point out the contradictory nature of the two policy elements – Policy HS3 is prescriptive for the site about where Green Belt enhancement and 'access' should take place. But Policy SD2 for the site does not define where Green Belt quality and '*public access*' should be enhanced. There is no justification provided for why Policy HS3 should be prescriptive in regard to location; neither policy explains the mechanisms for implementing these expectations. As an aside, July 2019 [national Planning Practice Guidance giving advice on Green Belt](#) now elaborates on the NPPF's policies with regard to compensatory improvements and should be reflected in future iterations of the Plan.



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

Response:

While these questions are primarily for RBC, the County Council, Highways England and the site's prospective developers to reply to, ECNF has instructed its own transport consultants (SK Transport Planning - SKTP) to consider the transport implications of the submission Plan's policies to release Green Belt land in Edenfield for allocation to provide 456 new homes (see ECNF's submitted 'Development Access and Capacity Review'). SKTP have reviewed Mott Macdonald's [highways capacity work](#) for RBC, and that of site H72's promoters, considering not only vehicular movements but also pedestrian and cycle access.

SKTP have concluded from their own development access and capacity review that there are 'a number of fundamental issues' and technical matters which 'have not been considered to date as part of the site evaluation exercise'. They state (in para. 3.5 of their assessment):

"This review has identified a number of technical matters that draw into question both the scale of residential development proposed, and the access strategies to identified land parcels. The evidence presented clearly demonstrates that the effects, in traffic and transport terms have not been appropriately assessed and the impacts at the addressed junction in the village are sever in the 2014 future year assessment."

For the H72 land west of Market Street, ECNF's consultants specifically conclude (pages 20 and 21):

"[the] development parcel proposes a simple priority junction arrangement onto Market Street – this is in a location where residential parking currently takes place on both sides of the carriageway, and vehicle speeds have been recorded to be in excess of the 30mph speed limit [...] flow data indicates that a ghosted right turn priority junction arrangement should be provided to safely access the development site [...] this ghosted right turn junction arrangement cannot be accommodated within the land controlled by the site promoter or the adopted highway, indication that there is a fundamental issue with the allocation of this site for the scale of development proposed..."

It is important to note too that Highways England (HE) in their submission Plan representations responded along similar lines (SKTP, para. 2.21):

"2.21 With regard to accessing this development; whilst HE acknowledged that masterplans would be prepared to support proposed residential allocations of more than 50 dwellings they have raised concerns that the potential allocation has:

"the potential to significantly impact upon the safety and operation of the SRN. It is unclear what access arrangements have been considered for this housing allocation, or that appropriate mitigation measures have been identified to address any significant impact on

the SRN. As such at this stage Highways England do not consider there is robust evidence to support the inclusion of this allocation and its removal from the Green Belt.” (HE emphasis)

SKTP’s overall conclusion for all of the development sites at Edenfield is clear and reads as follows:

“These findings demonstrate that the technical work prepared by the Council and site promoters to date has not appropriately assessed the impact of the scale of residential development in the village. In addition detailed assessments of the proposed access strategies to the various land parcels have not been presented, and from our site visits fundamental issues have been identified that bring into question the delivery of these sites for residential development.”

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

Response:

These are all questions for RBC, the County Council (as education authority) and the site promoters to respond to, as ECNF considers that the submission Plan and its evidence base – particularly the Council’s [Infrastructure Delivery Plan \(IDP, as updated\)](#) – do not provide any clear answers (e.g. in section 3 of the IDP Update). Sub-sections 3.1.2, 3.2.2 and 3.2.3 of the 2019 document each refer differently to primary education provision, as follows:

“Planned 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 [...]

The forecast demand at Edenfield is expected to be accommodated within existing schools within the first five years of the Local Plan, particularly as the majority of allocated sites are expected to be delivered later in the plan period [...]

There are two options considered for Edenfield either expansion of existing primary schools or provision of a new school. Funding for school expansion would need to be secured through Section 106 contributions and the Basic Needs Allocation. Timing of the development will need to be carefully considered to meet the pupil yield of the early development phases whilst ensuring existing schools are not destabilised. A new school may be required depending on the circumstances of the housing. The emerging Local Plan is seeking to protect land adjoining the existing school should expansion be necessary.”



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

Response:

As for f) above, ECNF cannot answer the first question with any certainty, save to say that 456 new homes in a small village such as Edenfield will create very considerable infrastructure needs – particularly in relation to transport and social provision. The only reference in the IDP Update to transport infrastructure improvements in Edenfield is to improvements to the Rochdale Road/ Market Street roundabout (T8 on Table 22) – ‘cost unknown’.

In order to make it clear to landowners and prospective developers, ECNF’s view is that if Policy HS3 were to be retained, it needs to specify (i) all of the infrastructure required to service all of the major sites in Edenfield that are proposed to be released from the Green Belt and (ii) the s106 obligations that applicants will be required to be entered into, if the policy is retained.

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

Response:

ECNF notes – as documented in the SKTP assessment (section 2) - that HE has had concerns regarding geotechnical issues relating to site H72 being developed for housing. SKTP quote:

“Following concerns regarding ground stability risks from land-slip, recommendation that: 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.”

2.23 Whilst not a traffic and transport matter HE has also formally commented that there are geotechnical issues with the development of site H72. They have stated in their 4th October 2018 response:

“...the presence of an existing land-slip beneath the site now dictates that the Council must now carry out a geotechnical assessment in order to provide a robust indication of the extent to which the allocation may be developed / contribute towards the housing target.”

2.29 The combination of technical evidence produced by MM in their Highway Capacity Study, coupled with the HE’s material concerns regarding land stabilisation within H72 brings into question whether this site is appropriate for residential development, and the scale of development proposed. To date we are not aware of any geotechnical information submitted to the Council to support the draft allocation in the emerging Local Plan.”

ECNF were also advised by Taylor Wimpey's planning consultants that site investigation works would be undertaken on the land west of Market Street in June this year. The local community and the Forum are aware that these works took place.

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

Response:

It is not clear to ECNF from RBC's evidence base that the majority of the constraints listed in the first question have been addressed. As regards heritage, the Council's August 2018 [assessment of development sites](#) refers to H72 as follows:

"Acceptable if the site is significantly reduced, inclusive of proposed numbers and boundary shall be pulled south of Mushroom House. Highest quality materials and design will be required and standard modern construction will not be acceptable. Materials shall be natural stone, natural roofing slates and timber for doors and windows with no exceptions. The houses will be restricted to two storeys on the entire site. A highly detailed landscaping plan will be essential, this will need to include strong buffering to the north of the amended boundary. Landscaping will also be required to buffer against any new roads of access which is created."

Policy HS3 does not reflect this conclusion in terms of providing guidance on, or specifying mitigation measures/ requirements relating to heritage – or any other aspects of the site H72's development.

- 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?**

Response:

With regard to the current position, the site promoter, RBC, Lancashire County Council as highways authority and HE should respond in detail to these questions.

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

Response:

It is clear from ECNF's responses above that the site has been found after extensive consideration to make positive contributions both to the local landscape and to the Green Belt. When these contributions are taken into account together with the social and transport infrastructure needs that a 400-home development will create, it is clear that the site's constraints mean that it should remain an undeveloped site in the Green Belt.



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

Response:

The site promoter and RBC should answer these questions. While it is noted that there is a 'combined illustrative masterplan', this is exactly what it says it is – it is not a plan which the promoters will be tied to in any future planning permission. ECNF does not consider that the Examination should treat it as anything other than 'for information only'.

- m) Is the site available and deliverable in the timescales envisaged¹?**

Response:

The site promoter and RBC will undoubtedly reply to this question in the affirmative, but ECNF would emphasise that SKTP's conclusions referred to above – particularly (but not solely) with reference to access and third-party land ownership – potentially indicate otherwise. With much uncertainty around primary school needs/ provision, ECNF has concluded that there can be no certainty around deliverability.

H70 – Irwell Vale Mill, Irwell Vale
H71 – Land east of Market Street, Edenfield
H73 – Edenwood Mill, Edenfield
H74 – Grane Village, Helmshore

The general questions below apply to each of the above sites. Additional specific questions are set out in the following sections.

General

- a) Is the site suitable for housing? Are there any specific constraints or requirements associated with the site, or a need to seek mitigation measures to achieve an acceptable form of development? Should these be specified in the Plan?
- b) Is the proposed site capacity appropriate, taking account of constraints and the provision of necessary infrastructure?

¹ As set out in the housing trajectory in the Council's Response to the Inspector's Pre-Hearing Note (Question 13).



- c) Is the site available and deliverable in the timescales envisaged²?
- d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?

Response:

ECNF does not have detailed, site-specific comments to make on these proposed allocations, save for its in-principle opposition to the removal of any undeveloped land from the Green Belt in Edenfield - for all of the reasons set out above in relation to H72, land west of Market Street.

H73 – Edenwood Mill, Edenfield

- 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?
- 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?

H74 – Grane Village, Helmshore

- i) What is the nature of the surface water flooding risks on the site? Can this be mitigated?
- ii) Can the site be safely accessed? What impact would the proposal have on the local road network, and are mitigation measures necessary? What is Lancashire County Council's latest position?

Response:

ECNF is not in a position to respond to these questions.

Yours sincerely,

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² As above.