

31st October 2019

FAO: Tony Blackburn
Rossendale Local Plan Programme Officer
15 Ottawa Close
Blackburn
BB2 7EB

Sent by email

Dear Tony,

**Taylor Wimpey application at Holcombe Road, Helmshore (Ref: 19/0335 - Allocation H74)
Application Update**

We are writing to provide an update on the above application, on behalf of the applicant Taylor Wimpey, in response to the invitation for further submissions after the Matter 14 Hearing, following its validation and documents being made available to view on 17th October.

We can confirm that an application for 131 dwellings was submitted on 2nd August and was validated from 24th September 2019 (Ref: 19/0335), with a target determination date of 21st December, and a target committee date of 10th December.

Various concerns were raised by local representors at the Matter 14 Hearing, both regarding the detail of the application and the overall procedure/ availability of information.

To clarify the position, Taylor Wimpey have actively engaged with the Grane Road Residents Association throughout the process to date and kept them up to date with progress on the application submission.

We had hoped the application would be validated in good time before the Hearings, meaning that the documents would have been available to everyone via the website, with the relevant notifications sent to neighbours; however validation was held up with various technicalities with the submitted documents (which is not uncommon on large schemes such as this). In response to this delay, the Resident's Group requested a copy of the application submission on 25th September, which we provided electronically the following day, and followed this with a full paper copy of the submission, including scale plans, which was posted on 27th September.

Taylor Wimpey have also met with the Residents Group on several number of occasions, most recently on the 15th October 2019, where a list of questions about the scheme were provided for Taylor Wimpey to answer. A response note to the questions was issued on the 30th October 2019. Both the original questions and response note are contained at **Enclosure 1**.

Furthermore, upon review of statements submitted by Mr Murray and Mr Hodbod, additional concerns were raised beyond those set out at Enclosure 1, and we have sought to address these below:

- **Education:** Concerns are raised regarding Primary and Secondary Schools in the area being oversubscribed. Lancashire County Council have now provided a consultation response on this which confirms that there is sufficient primary school capacity in the area, as whilst the development will generate a yield of 28 primary school places, latest projections indicate there will be 233 places available in 5 years-time, and therefore no primary school contributions are being sought.

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In respect of secondary school provision, the development will generate a yield of 13 places, which will need to be funded in full due to a projected shortfall of 48 places in 5 years-time, and as such a financial contribution of £314,000 will be provided to address this. In conclusion, local primary school provision can readily accommodate future pupils from the Holcombe Road site and a financial contribution will be provided towards secondary school provision.

- **Health:** The Council's Infrastructure Delivery Plan confirms there is currently capacity in Haslingden surgeries but will require expansion over emerging plan period across the Borough. This expansion will be principally funded by NHS grants, and if any additional financial contributions are required, these would be confirmed through the determination of the planning application.
- **Delivery:** Concerns are raised that there will be potential construction delays, due to concerns about the potential danger of flooding to Helmshore properties. We do not anticipate any delays to construction and have undertaken extensive due diligence which confirms that this site is highly deliverable. It is anticipated that the site will be fully delivered by 2023/24.
- **Landscape Impact:** Concerns are raised that the site sits within the buffer zone of the West Pennine Moors SSSI, which aims to promote Wildlife Conservation not eradicate habitat. A Landscape and Visual Impact Assessment (LVIA) has been submitted in support of the planning application. It concludes that the proposed development would not result in any significant adverse landscape and visual effects. Accordingly, the development proposals are acceptable from a landscape perspective.
- **Ecology:** Concerns are raised that there will be a loss of an essential habitat and wildlife corridor and that this will have a major impact on nature conservation. An ecology report (prepared by TEP) has been submitted with the planning application. This does not conclude that there are any wildlife corridors on this site. No protected species are located on site, and mitigation will be put in place (including bird boxes) to ensure that the development proposals are acceptable from an ecology perspective.
- **Heritage:** Concerns are raised that the site has an original weigh station and track beds to a railway line which services the quarries of Grane and Musbury. The Heritage Impact Assessment (Wardell Armstrong) submitted with the planning application has identified the presence of these railway tracks in the heritage assessment. It is confirmed in the Assessment that the railway lines are a non-designated heritage asset. The Report ultimately concludes that there would be no impact to the setting and significance of the majority of the designated heritage assets within the 1km study area of the site. Furthermore, there may at most be a negligible impact on the setting of the former Church of St Stephen's to the west of the site. It is also pertinent that the Council's Heritage Impact Assessment confirms that development of this site will have no predicted heritage impacts. Accordingly, the development proposals are entirely acceptable from a heritage perspective.
- **Air Quality:** Concerns are raised by local residents that in 6 out of 16 houses, the AQO Quality Objectives (AQO) will be exceeded. Further concerns are raised that further houses contained in the assessment may be affected than the 6 houses identified. Whilst it is noted that 6 sensitive receptor locations exceed the annual mean AQO for NO₂ across the ground floor locations, it is critical to note that exceedances were predicted to occur in both the 'without development' and 'with development' scenarios. Therefore, the exceedances are not as a direct result of the proposed development, but from existing conditions within the locality. Recent diffusion tube monitoring data provided by Rossendale Borough Council further supports this, which established a level of 48.5ug/m³ during 2018. Further, analysis of the affected properties indicated that first floor concentration is not predicted exceed the relevant objectives and determines that existing exceedances at such locations are isolated to ground floor areas.



In response to the number of affected properties, the assessment analysed worse case representative locations across Grane Road and the wider Haslingden area including the Rossendale No1 AQMA. The assessment indicated that exceedances of the AQO are isolated to 6 ground floor kerbside properties adjacent to the B6232 (West) and the A56. It is therefore concluded that exceedances of the AQO are not wide reaching, and in fact isolated with an area east of Gas Street and west of Grane Park.

Accordingly, the associated impacts were considered as not significant in accordance with the relevant guidance. The development proposals are therefore acceptable from an air quality perspective.

- **Other:** The Residents request that a generous landscape buffer between existing properties along Grane Road and the development proposals should be provided. The development proposals have been carefully designed so that they accommodate an acceptable development set back from Grane Road (with parking to the front to provide a further set back from the proposed dwellings). The siting of the proposed dwellings has also been designed to ensure that site constraints elsewhere on site have been accounted for and that a sufficient quantum of development can be provided to maximise the use of this part brown-field site. Accordingly, the proposed site layout is acceptable from a planning and design perspective, albeit this will be discussed in detail with planning officers through the planning determination process.

I trust the above representations are clear, but should you or the Inspector require any clarification or further information please make contact on the details below.

Yours sincerely,

Graham Lamb
Director



Questions for Taylor Wimpey – 15 October 2019

- Viability report & planning statement states no affordable housing will be built due to provisions from S160 (education/bins) and remedial work to gas site etc. What has changed as now there are around 30 marked as affordable housing?
- States 'existing dry stone walls from the site reused as a gateway feature where possible'. Why only where possible?
- 1 metre high wall along Grane road, what material? Reason for wall stated in planning statement is for noise reduction (houses are set down)
- Why is the current boundary hedgerow along Grane road being replaced? Surely keeping existing trees will be better environmentally as won't have to wait for new one to grow to be of benefit, not only to air quality but also wildlife.
- Where are the bat and bird boxes going to be placed as not shown on the maps? Stated these are being put in to help the wildlife they'll be bulldozing.
- TW states looked into bungalows and housing for elderly but not 'viable'. What have they explored exactly and why not viable?
- States 'The Noise Assessment has assessed the impact of road traffic on the development proposals. The technical assessment concludes that some mitigation measures are required to ensure that internal and external noise levels do not exceed accepted noise standards. This relates to specific areas and plots of the development' - but fine for everyone else living in Grane road and the additional traffic from these properties?
- also just of general interest in a letter from the council to Pegasus it states 'During the meeting held on Friday 14 September 2018, it was mentioned that the Highways Capacity Study looked at Grane Road / Holcombe Road junction and the Grane Road/A56 junctions as part of the Junctions 8, 9a and 9b Grane Road Corridor. The study concludes that the junctions perform satisfactorily in all assessment scenarios during the morning peak, however "there is a worsening of performance on the A56 off-slip and on Holcombe Road at the 2034 Local Plan scenario". The study is proposing a three arm signalised junction between Grane Road and Holcombe Road, as well as the signalisation of the A56 on-split/Waterside Rd junction and the relocation of the existing Jubilee Road bus stop located on Grane Rd. - this will need raising with the council re traffic issues before they charge ahead with their plan.
- More re the council but TW have been advised that part of the s160 costs, they have put aside £108k for offsite open space and sports do we get a say in how this money is spent?!

Points from FB group

- will they be true freehold? Are council adopting all roads/ cul de sacs and green spaces or will there be maintenance fees for residents?
- Japanese knotweed in plot off Gas Street, do they know?
- How are they offsetting their carbon footprint?
- Exactly how many trees will they replant?
- Are they doing anything about the current footpaths along Grane Road?
- Exact location of pedestrian crossing
- Who is responsible for doing something about the Grane/Holcombe junction? (I think TW in the planning app state it's nothing really to do with them)

Response to Questions from Grane Residents' Association: Land at Holcombe Road, Haslingden (Planning Application 2019/0335)

Pegasus has been instructed on behalf of their client, Taylor Wimpey, to prepare a response note to the questions raised by Grane Residents' Association (GRA) in a letter dated 15th October 2019. The questions are raised in relation to the development proposals at land at Holcombe Road, Haslingden (Ref: 2019/0335), which seeks full planning permission for the erection of 131 no. residential dwellings.

For ease of reference, we set out the GRA comments in italics and outline our response thereafter.

Viability Report and Planning Statement states no affordable housing will be built due to provisions from Section 106 (education/bins) and remedial work to gas site etc. What has changed as now there are around 30 marked as affordable housing?

Core Strategy Policy 4 seeks 30% affordable housing on large greenfield sites, subject to viability, with part 2c stating: "a relaxation of the above requirements will only be considered if it is demonstrated that this would result in the development being financially unviable based on the findings of an economic viability assessment submitted to and approved by the Council."

When the plans were initially tabled the viability assessment had not been completed and therefore 30% affordable was shown on site, in line with the policy, albeit noting that this was subject to viability.

When the Viability Assessment was completed it confirmed that based on the current calculation of costs and ensuring a policy compliant level of Section 106 contributions, the development would only be viable if no affordable housing is provided.

This is mainly a result of the high abnormal costs associated with the development, most notably with remediating the contaminated gas works but also for items such as re-grading the site levels and the provision of a sub-station. Furthermore, other additional abnormal costs resulting from planning requirements have been included in the viability costings, such as the provision of a new roundabout at the site entrance, generous levels of on-site public open space, noise mitigation features and the provision of stone walls within the site.

Please note that this is a starting point for discussion with the Council; as both the abnormal costs and potential Section 106 contributions are estimates at present and will be refined during the planning determination process.

Taylor Wimpey are committed to providing affordable housing wherever viable, so will work with the Council to ensure that some affordable provision is made, should the position improve by the time the application is determined.

States 'existing dry-stone walls from the site reused as a gateway feature where possible'. Why only where possible?

This phrasing reflects the fact that some of the stone may not be in a suitable or safe condition for reuse (i.e. of crumbling, degraded nature).

1 metre high wall along Grane Road, what material? Reason for wall stated in planning statement is for noise reduction (houses are set down).

The wall is proposed for acoustic mitigation purposes to screen the proposed houses, which are some distance below, from noise from the road. Whilst it will need to meet certain acoustic specifications, the actual material has not been confirmed and can be agreed through the determination process with Officers or via condition.

Why is the current boundary hedgerow along Grane Road being replaced? Surely keeping existing trees will be better environmentally as won't have to wait for new one to grow to be of benefit, not only to air quality but also wildlife.

The existing hedgerow along Grane Road is considered gappy and low-quality vegetation and will be replaced with a 1m high wall to provide acoustic screening as noted above with a new hedgerow inside it to provide a high-quality finish to the scheme, giving a sympathetic interface between the proposed development and existing setting of Grane.

The proposed replacement hedgerow will be a native mix and will be maintained as part of a future management plan for the site.

Where are the bat and bird boxes going to be placed as not shown on the maps? Stated that these are being put in to help the wildlife they'll be bulldozing.

These details will be confirmed through the application determination and/or discharge of condition process in discussion with officers and ecology consultees. The bird boxes for mitigation of lost nesting habitat will need to be placed on retained trees and any hedgerows that are to be retained prior to habitat removal. The retained trees are in the north west of the site, so it is likely that the boxes will be installed on suitable trees here. Bat and bird boxes for enhancement would be installed on new houses either during the building process if integral or once construction is complete.

TW states looked into bungalows and housing for elderly but not 'viable'. What have they explored exactly and why not viable?

Taylor Wimpey do not construct bungalow properties. Furthermore, this would not be an efficient use of the site. The application has been guided by planning policies of Rossendale Council, where elderly homes are not a requirement of this site.

States the Noise Assessment has assessed the impact of road traffic on the development proposals. The technical assessment concludes that some mitigation measures are required to ensure that internal and external noise levels do not exceed accepted noise standards. This relates to specific areas and plots of the development- but fine for everyone else living in Grane Road and the additional traffic from these properties?

Noise mitigation is required on the site because of the road noise which currently exists on Grane Road, not due to any new vehicle movements which will be generated from the development proposals. The increase road traffic movements from the site will not result in a material change to noise levels on Grane Road, given it is already a busy road, and the fact that the access is actually on Holcombe Road and therefore not all vehicle movement from the development will travel on Grane Road.

In fact, the Transport Assessment suggests the development will generate an increase of between 1.4% and 2.1%, yet it is estimated that it would take a 25% increase in traffic on Grane Road to make a 1db noise increase, which is not a perceptible change anyway. As such, the increased percentage of traffic flows from this development of 131 no. dwellings will be negligible in terms of noise levels along Grane Road.

New development proposals are required to meet accepted noise standards as set out in the relevant guidance. Therefore, noise mitigation measures are proposed on site to ensure that the development accords with these. The current situation in relation to properties along Grane Road is not under Taylor Wimpey's control.

Finally, it is worth noting that noise conditions at the existing and proposed properties are different, particularly in relation to external noise. The existing properties are level with and directly fronting the road, with the buildings themselves providing screening to reduce noise in the rear gardens; however the proposed dwellings are set back and much lower than the road, so the buildings provide less effective screening and require additional fencing to reduce noise.

Also just of general interest in a letter from the council to Pegasus it states 'During the meeting held on Friday 14 September 2018, it was mentioned that the Highways Capacity Study looked at Grane Road/Holcombe Road junction and the Grane Road/A56 junctions as part of the Junctions 8, 9a and 9b Grane Road Corridor. The study concludes that the junctions perform satisfactorily in all assessment scenarios during the morning peak, however "there is a worsening of performance on the A56 off-slip road and on Holcombe Road at the 2034 Local Plan scenario". The study is proposing a three-arm signalised junction between Grane Road and Holcombe Road, as well as the signalisation of the A56 on-split/Waterside Road junction and the relocation of the existing Jubilee Road bus stop located on Grane Road. This will need raising with the council re traffic issues before they charge ahead with their plan.

The impact of the development Grane Road/Holcombe Road and Grane Road/A56 slip road junctions are considered within the Transport Assessment. The results of this analysis have demonstrated that traffic associated with the development proposals can be accommodated on the local highway network.

However, as part of the determination of the planning application detailed discussions will be held with the local highway authority (Lancashire County Council) and Highways England to ascertain whether they require any highway improvement scheme to mitigate the impact of the development proposals.

More re the council but TW have been advised that part of the S106 costs, they have put aside £108k for off-site open space and sports... do we get a say in how this money is spent?

This amount/final figure has yet to be confirmed and it is for the Council to decide during the planning determination process. However, any money spent will need to be directly linked (i.e. in close proximity) to the development in order to meet the CIL Tests for financial contributions.

Will they be true freehold? Are Council adopting all roads/cul de sacs and green spaces or will there be maintenance fees for residents?

All Taylor Wimpey properties will be sold on a freehold basis to their customers. Private roads are included at the end of estate roads for up to 10 dwellings. The private areas, open space and public green areas will be maintained by a management company.

Japanese Knotweed in plot off Gas Street, do they know?

The Ecology Report submitted with the planning application confirms that Japanese Knotweed has been recorded on site in the south east corner. The Ecology Report recommends that an Invasive Species Method Statement will be required to eradicate and manage this species, as well Himalayan Balsam on the site.

Exactly how many trees will they replant?

193 individual trees are proposed to be planted across the site, as well as 0.2ha of proposed native woodland mix. Please refer to the landscaping plans submitted with the planning application for full details.

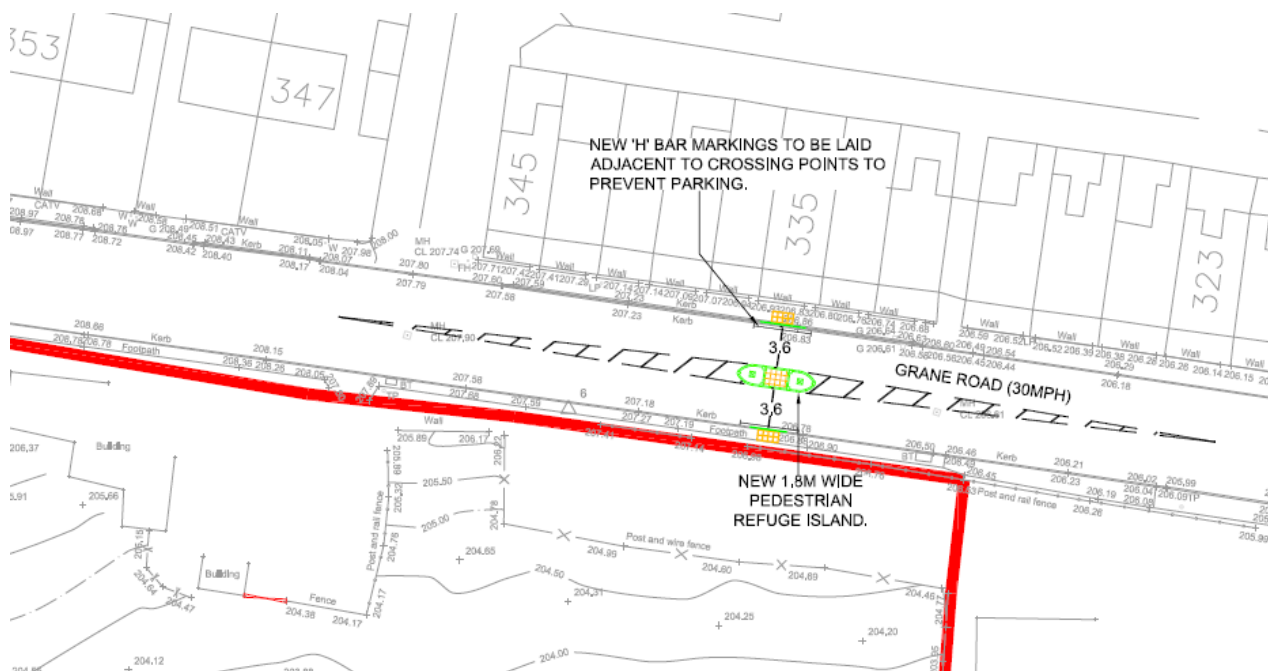
Are they doing anything about the current footpaths along Grane Road?

The existing footpaths along Grane Road are not within Taylor Wimpey’s ownership, and fall under the control of the local highway authority, Lancashire County Council (LCC).

Therefore no footpath improvements are proposed as part of the development proposals; nor have any been requested in pre-application discussions with LCC. However, if a need for improvement is requested and justified during the application process, then the Holcombe Road development proposals could provide a proportionate financial contribution towards these.

Exactly location of pedestrian crossing

Plan 4 of the submitted Transport Assessment shows the exact location of the proposed pedestrian crossing on Grane Road. As shown overleaf, it is proposed to be located opposite no. 335 Grane Road.



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Who is responsible for doing something about the Grane/Holcombe junction? (I think TW in the planning app states it is nothing really to do with them).

Lancashire County Council (LCC) is the Highways Authority in charge of the local highway network, including the Grane Road/Holcombe Road junction. If there is an identified need for any mitigation works, this would be led by LCC. The Holcombe Road development proposals can provide a proportionate financial contribution towards any future mitigation works, if requested and justified by LCC.