

**SCHEDULE OF ACTIONS MATTER 14 (HOUSING SITE ALLOCATIONS:
EDENFIELD, HELMSHORE, IRWELL VALE AND EWOOD BRIDGE)**

ACTIONS 14.1 – 14.4

1 INTRODUCTION

- 1.1 During the Hearing Session on Matter 14 (Housing Site Allocations: Edenfield, Helmshore, Irwell Vale and Ewood Bridge), as part of the emerging Rossendale Local Plan Examination, the Inspector requested further information for a number of the housing site allocations.
- 1.2 There are several Appendices relating to these sites, and they are listed below, and follow at the end of this document.

Appendix No.	Summary	Matter Ref	Allocation Ref
1	Environment Agency comments	14.1	H70
2	Local Plan Examination: Green Belt Actions (LUC)	14.2; 14.3; 14.4	H72; H73
3	Heritage Impact Assessment, Growth Lancashire	14.3	H72
4	Letter from planning agents for H72 – 28.01.2021		H72
5	Highways Agency's comments re. slip road at Junction 0 of the M66	14.4	H73

2 ACTION 14.1

ACTION REF. NO.	ACTION
14.1	<u>H70 – Irwell Vale Mill, Irwell Vale</u> i. Add PWA Planning information on flood risk to the library ii. PWA planning to report feedback from Environment Agency about the river widening scheme – add to Library, implications for site capacity

- 2.1 The Flood Risk Study referenced by PWA Planning during the Hearing Session on Matter 14 has already been added to the Examination Library under reference [EL4.012](#).

2.2 An outline planning application (ref. 2019/0405) has been submitted for site allocation H70, proposing the re-development of the site and erection of up to 30 no. dwellings <https://publicaccess.rossendale.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PYAQ34NDK5H00> .

2.3 The Environment Agency (EA) has provided comments on the application which are included in Appendix 1 of this response. In summary, the general strategy for flood risk mitigation (i.e. some form of river channel widening) has been agreed at outline stage, and the final details of the strategy will be submitted at Reserved Matters stage, and further agreed before development starts. Full details of the planning application can be viewed on [public access](#).

3 ACTION 14.2

ACTION REF. NO	ACTION
14.2	H71 – Land east of Market Street, Edenfield: Specific Green Belt assessment to be undertaken for this site

3.1 Land Use Consultants (LUC) have undertaken a specific Green Belt assessment for this proposed allocation, please see Appendix 2. In their initial assessment (the 2016 Green Belt Study) this was assessed as part of a much larger parcel.

3.2 This latter assessment considered solely the specific proposed allocation H71. It acknowledges that the proposed allocation comprises brownfield land, used for storage purposes which ‘adversely affect the character of the Green Belt’. Furthermore not all of the allocation falls within the Green Belt. Nevertheless LUC consider that in keeping with the earlier assessment of which this land formed a part, the site makes a strong contribution to preventing sprawl of the large built-up area (Green Belt purpose 1).

3.3 The Council considers this previously developed land, of which a small part is in the Green Belt, will help to provide a defensible long-term boundary, given the current small part of uses of the land. Suitable design and sympathetic landscaping will be essential to ensure the sensitive rural/urban interface is adequately addressed. This could be set out in a Site Specific policy for this allocation. This small release will also assist in the redevelopment of an under-used brownfield site.

4 ACTION 14.3

ACTION REF. NO.	ACTION
	H72 – Land west of Market Street, Edenfield: i. Lancashire County Council to provide a note to the Inspector regarding some wording for access and transport improvements in Policy HS3

14.3	<p>ii. Provision of additional information regarding education requirement in Edenfield – feasibility to expand Edenfield or Stubbins Primary Schools</p> <p>iii. Undertake a Green Belt assessment for the option of the Edenfield School extension – clarify exceptional circumstances</p> <p>iv. Note to confirm if the Green Belt assessment of the whole site allocation would differ from the assessment of the 3 parcels that has been carried out in the study</p> <p>v. Note to confirm the heritage position especially regarding the issue of substantial harm and how this conclusion has been reached?</p> <p>Consider production of mitigation plan showing any areas not to be built on including set back and any impacts on site capacity</p> <p>vi. Note setting out a clear timeline on the delivery trajectory taking account of the different stages (e.g. masterplan agreement, design code, approval of planning application) that would lead to the completion of the first units in 2021; to be done in conjunction with the landowners</p> <p>vii. Publish Highways England update position statement and invite comments (see EL4.010 and Responses)</p>
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i. Lancashire County Council to provide a note to the Inspector regarding some wording for access and transport improvements in Policy HS3

4.1 The following comments have been made by LCC Highways (08.07.2020)

Dealing with each site individually,

*The **central site** will be accessed directly from Market Street through the field opposite nos. 88 – 116 Market Street. Although there are no underlying issues with an access formed within this area , the precise position will need to be fully assessed taking account of the available sight lines , existing parking demand etc.*

*To the **north of Church Lane** is a smaller site, it is proposed to form an access onto Blackburn Road in the field adjacent to 5 Blackburn Road. There are site constraints associated with any potential access namely the visibility splay in either direction and the proximity of the signalised junction consequently the junction design and positioning will need careful consideration to achieve an acceptable design*

*The proposed access for the **southern site** is along the length of Exchange Street. There are a number of issues with the use of Exchange Street which are as follows.*

1. the width is approximately 5 m with evidence of on street parking close to the junction with Market Street and further along which is possibly associated with the adjacent recreation ground and children's play area. This parking restricts traffic flow on the street

2. There is no continuous footway to the site on either the north or south side of Exchange Street. There provision is considered essential for the development site to progress but may require third party land acquisition and dedication.

3. The junction of Exchange Street with Market Street is close to an existing zebra crossing and any additional movements at this junction are likely to increase the potential conflict between turning vehicles and pedestrians using the crossing facility.

It is therefore suggested that this area of the site is accessed through the estate to connect to the access formed from Market Street with only pedestrian and cycle links to Exchange Street

The addition of circa 400 additional dwellings in Edenfield will place additional strain on the local highway infrastructure and any development would be expected to assess this impact and suggest improvements to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rostron Arms and include measures to assist pedestrian and vulnerable road user interests.

ii. Provision of additional information regarding education requirement in Edenfield – feasibility to expand Edenfield or Stubbins Primary Schools

4.2.1 Although still to be finalised, Lancashire County Council Education Department are looking to accommodate 148 additional primary pupil places in Edenfield, as a result of this proposal. This figure is expected to be a maximum as it is based on all properties having 4-bedrooms. Also of note, the estimate considers pupil projections at the time. These pupil projections are expected to be re-run soon.

4.2.2 Lancashire County Council held initial discussions with both Edenfield CE and Stubbins Primary Schools to ascertain if it is appropriate pursuing further work relating to the feasibility to expand one of these schools to 1.5 form entry. Both schools indicated an interest although as the Education Authority makes clear “this will require a full and comprehensive statutory consultation process, which will involve representatives from the Manchester Diocese for Edenfield Church of England Primary School”.

4.2.3 An initial feasibility study has been undertaken by LCC Education for each school and is summarised below.

Edenfield

Based on Department of Education guidance, a requirement of 2,100 m² would be required from the third party owners. This would allow the additional building, potentially on the existing hard surface play area, which would require replacement. As yet a full feasibility has not been carried out which allows for a full design concept and full cost analysis to take place.

Stubbins

The situation at Stubbins CP allows the potential expansion of the existing school up to 1.5 form entry without additional land. However, after an initial site visit the varying land levels may provide challenges to link the required number of classrooms and services required. The full cost implications and site access will require considerable planning and full feasibility. LCC Education report that parts of the school operate on two levels which presents day to day operation challenges.

Feasibility Studies

Unfortunately LCC has been unable to proceed with the full feasibility study for each school due to staff being re-deployed as a result of to Covid. Nevertheless, there are certainly options available to ensure that primary school places can be accommodated within Edenfield. The County Council is fully aware of the need to accommodate this proposal and this will need to be addressed in the Masterplan work.

iii. Undertake a Green Belt assessment for the option of the Edenfield School extension – clarify exceptional circumstances

Green Belt Assessment for Edenfield School Extension

4.3.1 An assessment of the harm to the Green Belt, if this land was to be used by the School, was undertaken by Land Use Consultants, and concludes that the school expansion would not cause significant harm. This is set out in Appendix 2.

4.3.2 The assessment notes that the creation of a replacement playground within the Green Belt part of the school grounds would constitute only a limited impact on Green Belt openness, and would have little urbanising impact, given that the area is already part of school site and therefore functionality associated with the inset settlement. It is therefore considered that the proposed school extension would not lead to significant harm to the Green Belt.

4.3.3 In undertaking this assessment LUC has assumed that the existing hardstanding sports pitch, immediately to the rear of the school (which is in the Green Belt) would be partially built on, and that a replacement pitch would need to be built further east into the wider playing field. The playground is contained by inset buildings on two edges, and enclosed by dense tree cover on a third side, so the impact on the integrity of the adjacent Green Belt would be negligible.

Clarify Exceptional Circumstances

4.3.4 Edenfield School expansion is discussed in Matter 8.11 (Exceptional Circumstances) which proposes that Edenfield CE Primary School would remain in the Green Belt and any application for a school extension would be considered under very special circumstances. Para 4.3 states:

“Whilst the potential land required for this has been identified on the Policies Map, as expansion of Edenfield Primary is only an option (along with expansion of Stubbins Primary or a new school elsewhere, including within the allocation itself), the land required for this expansion was not specifically proposed for Green Belt release. Rather, it is envisaged that if any development were considered necessary in future, this would constitute “very special circumstances” and would be dealt with under the provisions of paragraph 144 of NPPF”.

4.3.5 Para 144 of the NPPF states:

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

4.3.6 Furthermore, para 146 continues “Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it”. This specifically includes: (e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds).

4.3.7 As such the Council considers there is sufficient flexibility to retain this land in Green Belt and still enable the school in principle to expand as necessary, subject of course to other policies set out in the Local Plan. This likewise applies to Stubbins although the extension will be located in the Green Belt. A main modification to clarify this in Policy HS3 is proposed.

4.3.8 As such the Council is not arguing Exceptional Circumstances to release this land. Rather than releasing this land for development per se, the Council considers it necessary to protect it for possible future school expansion to support the development of the housing allocations within Edenfield, as required by LCC Education.

iv. Note to confirm if the Green Belt assessment of the whole site allocation would differ from the assessment of the 3 parcels that has been carried out in the study

4.4.1 LUC's Assessment is attached as an Appendix. It concludes
".....all of the H72 site has boundaries which would prevent any significant impact on the wider Green Belt and hence the release of the Allocation as whole will not lead to any greater increase in harm than that identified in the original 2016 Green Belt assessment."

v. Note to confirm the heritage position especially regarding the issue of substantial harm and how this conclusion has been reached? Consider production of mitigation plan showing any areas not to be built on including set back and any impacts on site capacity

4.5.1 The Heritage Impact Assessment is attached as an Appendix and concludes,
"On the evidence provided and from my own site visit I conclude that the housing allocation will cause only a very low level of harm to contribution made by the setting to Edenfield Parish Church. This only affects the area immediately south of the wooded enclosure to the Church and grave yard. As indicated above I think this level of harm could be mitigated by clever design of the housing layout".

vi. Note setting out a clear timeline on the delivery trajectory taking account of the different stages (e.g. masterplan agreement, design code, approval of planning application) that would lead to the completion of the first units in 2021; to be done in conjunction with the landowners

4.6.1 Please see appended letter from the agents representing the three landowners. This letter acknowledges *"that the programme has slipped due the delays to the wider Local Plan (and publication of associated evidence/ actions) and the ongoing effects of the pandemic; with the Council agreeing in Autumn 2020 to let the developers provide a draft of the brief to maintain momentum, which we have been working on over recent months"*.

4.6.2 The scope of the masterplan has been submitted to the Council for consideration alongside the agents' letter.

4.6.3 This letter expects the masterplan will progress in the coming 2-3 months, and requests submission to committee by Summer 2021 (with a new meeting schedule to be confirmed from May onwards following the local elections). Based on consultation on the Main Modifications in Summer 2021, the agents note that adoption is expected to follow in late 2021/ early 2022.

4.6.4 Based on an accelerated delivery compared to the Council's more cautious trajectory, the agents expect the site to be fully built out by 2030/31. This assumes a start date of late 2023, with a planning application lodged in summer 2022 and consent granted later that year. The Council notes that previous housing schemes constructed in Rossendale by Taylor Wimpey have been built out at more than 30 units per year and so consider this trajectory suggested by the developers as appropriate.

5 ACTION 14.4

ACTION REF. NO	ACTION
14.4	H73 – Edenwood Mill, Edenfield: i. Consider whether Highways England require specific wording for the slip road ii. Undertake a further Green Belt Assessment for the site iii. Amend boundary to include car park iv. Publish Highways England update position statement (this has now been published on the website)

Wording for Slip Road

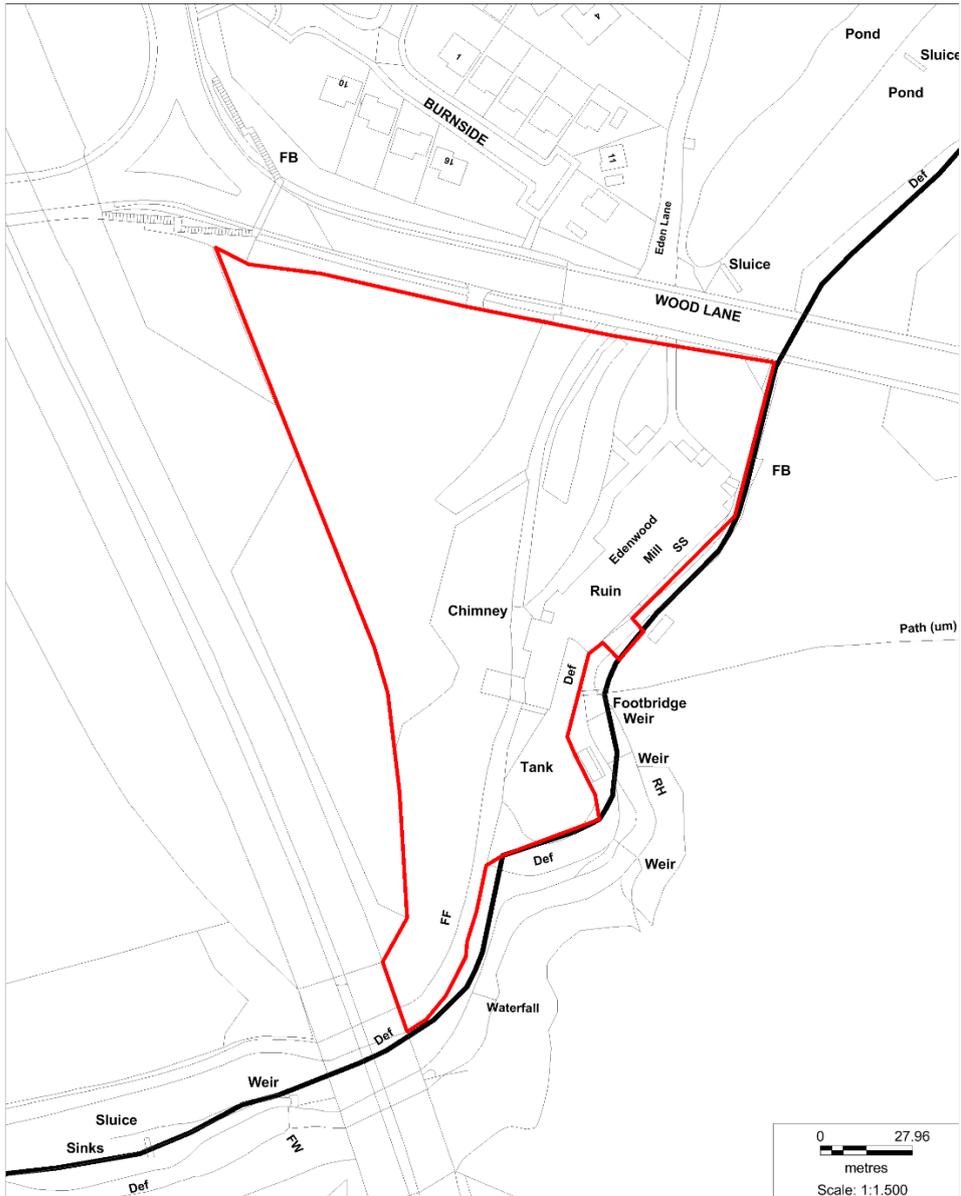
5.1 When consulted on Action 14.4, Highways England confirmed they have no aspiration to introduce south-facing slip roads to / from the M66 at Junction 'O' / Edenfield junction at present, or as a consequence of accommodating the Local Plan growth envisaged. As such, they do not specifically seek to include any wording associated with the policy for site allocation H73 to safeguard land for the purpose of a slip road. This is shown in Appendix 4.

Green Belt Assessment

5.2 Appendix 2 contains LUC's specific assessment for the allocation, given that the earlier 2016 Study assessed this as part of a wider parcel where the main concern was the narrow gap between Edenfield and Stubbins. In their assessment of just the land proposed for allocation as H73 LUC comment that the trees within the parcel are important to 'preserving perceived settlement separation'. They conclude that if the screening tree cover is preserved harm would be reduced. In respect of the derelict mill the Update notes this 'lies to the south of [the] tree belt, where Green Belt release would cause higher harm, but this could constitute the redevelopment of an existing building'.

5.3 Please see map of amended boundary below:

**H73 - EDENWOOD MILL, EDENFIELD
NEW SITE BOUNDARY (POST LOCAL PLAN HEARING)**



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Map Key	
	Borough Boundary
	New Site Allocation Boundary



Highways England Update Position

5.4 Please refer to Examination Library Document Ref EL4.010

**APPENDIX 1 –
ENVIRONMENT AGENCY COMMENTS RELATING TO IRWELL VALE MILL
(Planning Ref 2019/0405)**

Our ref: NO/2019/112132/04-L02 Your ref: 2019/0405

Date: 27 April 2020

Dear Sir/Madam

OUTLINE APPLICATION (WITH ALL MATTERS RESERVED): DEMOLITION OF ALL EXISTING BUILDINGS AND ERECTION OF UP TO 30 NO. DWELLINGS

IRWELL VALE MILL AITKEN STREET RAMSBOTTOM BURY LANCASHIRE BL0 0QG

I refer to the above application and our previous response dated 20 April 2020.

We withdrew our objection to the propose development subject to the inclusion of several conditions on any subsequent approval. Unfortunately, there was a typographic error in our flood risk condition regarding the finished floor levels being set 150 m above existing ground level; it should have been 150mm. We also omitted to include a condition requested by our fisheries, biodiversity and geomorphology team.

Given the above, we wish to amend the flood risk condition and add a further condition regarding the biodiversity of the new river channel. Our contaminated land comments remain unchanged.

1. Flood risk

For the reasons outlined in our previous response, we recommend that any subsequent approval is conditioned as follows:-

Condition The development shall be carried out in accordance with the submitted flood risk assessment (FRA) by Weetwood (Final Report v1.1 dated November 2019; referenced 4249/FRDA/Final/v1.1/2019-11-19) and the following mitigation measures stated within Sections 5 and 8:-

- Removal of the two existing mill bridges;
- Construction of flood wall along the southern bank of the River Ogden within the site. Top of wall level set at 144.1 metres (m) Above Ordnance Datum (AOD);
- Construction of flood storage area. Invert level of flood storage area set between 143.2 m AOD to 143.8 m as shown in Figure18 of the approved FRA;
- Northern parcel development platform raised above the peak level in the 1 in 100 plus 35% climate change AEP event;
- Finished floor levels to be set at a minimum of 600 mm above the 1 in 100 plus 35%

Cont/d..

climate change AEP event; □ Finished floor levels to be set 150 mm above adjacent ground levels; □ Implementation of a French drain along the northern edge of the site; □ A minimum 8 m undeveloped buffer strip is provided adjacent to the River Ogden; □ Flood Response Plan to be developed in consultation with Rossendale Borough Council

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development. Reasons

- To reduce the risk of flooding to the proposed development and future occupants. □ To reduce risk of flooding to surrounding properties. □ To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided. □ To reduce the risk of flooding to the proposed development and future occupants. □ To reduce the risk of flooding from surface water. □ To ensure adequate land drainage. □ To ensure access to the river for future maintenance. □ To reduce the risk to future occupants.

As stated previously, this development will require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the bank of the River Ogden which, is designated a 'main river'. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. 2. Fisheries, biodiversity & geomorphology

We generally welcome the revised FRA and Figure 18: Flood Mitigation Measures that proposes an amended residential footprint with an opportunity to more positively integrate the development with the River Ogden Water Framework Directive (WFD) waterbody and the main green infrastructure asset within the Irwell Vale Mill site. This creates the ability to enhance the environmental quality of the WFD waterbody and key ecological network through preservation of an undeveloped riparian buffer in combination with creating a new multifunctional flood storage area (FSA) along the left hand bank of River Ogden. Environment Agency position

Development that encroaches on watercourses can have a potentially severe impact on their ecological value. Networks of well-designed and managed undeveloped buffer zones also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the NW river basin management plan (<https://www.gov.uk/government/publications/north-west-river-basin-district-river-basinmanagement-plan>). The proposed development will therefore be acceptable if a planning condition is included requiring a scheme to be agreed to protect a minimum undeveloped 8 metre wide buffer zone along the River Ogden's north western and southern banksides, and a new 20 metre flood storage area along the River Ogden's left hand bank as outlined in indicative design layout proposals in Figure 18: Flood Mitigation Measures in the approved FRA by

Cont/d..

Weetwood (Final Report v1.1 dated November 2019; referenced 4249/FRDA/Final/v1.1/2019-11-19):-

Condition No development shall take place until a detailed scheme for the provision and management of a minimum 8 metre wide buffer zone and new 20 metre wide multifunctional flood storage area (FSA) along the River Ogden waterbody are approved in writing by the local planning authority. Thereafter the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from new built development including lighting or domestic gardens and shall include:

- detailed plans, including cross-sections (minimum 2 for proposed 8 m buffer area and minimum 4 along FSA area), showing the extent and layout of the riparian buffer zone in respect to new proposed residential development, mean and bank-full water levels, and / or any changes to bed composition □ details of proposed bank lowering or land raising within or adjoining new FSA or greenspace buffers □ details of any new revetment options proposed within the River Ogden riparian corridor using bio-engineered options unless it can be demonstrate they are not feasible □ details of removal of redundant buildings and bridges over River Ogden □ an updated ecological appraisal based on amended scheme footprint outlining how opportunities to create a high quality and multifunctional flood storage area and improved ecological network will be adopted as part of riparian scheme design □ details of any retained or restored greenspace in riparian corridor, including production of an integrated riparian soft landscaping scheme including planting schedule based on native species □ details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan □ details of any proposed new surface water outfalls, footpaths, fencing, lighting, etc. within River Ogden riparian corridor
- Reasons Land alongside watercourses are particularly valuable for wildlife and it is essential this is protected. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy and adopted policy 17 (GI) & 18 (Biodiversity) of the Rossendale Core Strategy

This approach is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

From an ecological and geomorphological perspective, we welcome the indicative revised plans to retain a minimum 8 metre undeveloped buffer, whilst creating new 20 metre multifunctional flood storage area along the River Ogden waterbody and key green infrastructure asset. However, we are currently unable to fully assess the outline application submitted, due to a lack of information surrounding the new channel and river corridor design proposals. The current plans do not include any detailed information on any bank remodelling or lowering along the River Ogden or how the existing Irwell Vale mill will

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be removed and riparian corridor reinstated.

Greater clarification is sought in the form of a number of cross sections along the riparian scheme, to understand how new raised residential platform and flood storage area with positively interact with WFD waterbody and ecological network to create a high quality and multifunctional green infrastructure asset for the benefit of both people and wildlife. It is also recommend the preliminary ecological appraisal (e3p, September 2019) be updated to reflect revised development proposals and outline how new riparian residential development provides opportunity to enhance existing failing WFD waterbody and create a new multifunctional green infrastructure asset as part of new flood storage area.

In regards to WFD we would recommend the applicant consider how the proposals will impact on each WFD quality element for this failing WFD waterbody, and whether there is an opportunity to contribute to the relevant WFD mitigation measures. Assessing the impacts of the proposals on each WFD quality element and opportunities to achieve the objectives of the WFD will ensure that proposals are WFD compliant.

We would recommend any new revetment associated with raised development platform is set outside the 8 metre riparian buffer or flood storage area, and it preferentially be based on an bio-engineering design (<http://www.hrwallingford.com/news/supporting-green-riverengineering>), where feasible.

It is generally welcomed that proposed redundant bridges over the River Ogden are to be removed as part of future scheme proposals, but details as to how this would be conducted whilst ensuring protection of waterbody and ecological receptor should be provided. In order to assess the level of risk to the riparian environment and ensure positive integration of the River Ogden and associated land, suitably scaled plans

/drawings, including cross sections showing the relationship of the proposed development to the river will be required at the detailed planning stage.

Yours faithfully

Philip Carter Planning Officer - Sustainable Places

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Direct e-mail [REDACTED]

APPENDIX 2

Local Plan Examination: Green Belt Actions (LUC)

Rossendale Borough Council

Rossendale Green Belt Study

Local Plan Examination: Green Belt Actions

Draft report

Prepared by LUC

January 2020

Rossendale Borough Council

Rossendale Green Belt Study
Local Plan Examination: Green Belt Actions

Version	Status	Prepared	Checked	Approved	Date
1.	Draft report	Lucy Wallwork Richard Swann	Sarah Young	Sarah Young	28.01.2020

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Chapter 1

Introduction

1.1 LUC were commissioned in 2016 to undertake a Green Belt Study for the Borough of Rossendale. The two main aims of this Study were to:

- Appraise the whole of the Green Belt within Rossendale against the five nationally defined purposes of the Green Belt as set out in the NPPF.
- Provide clear conclusions on the relative performance of Green Belt which will enable Rossendale Borough Council to consider, alongside other issues, whether there are 'exceptional circumstances' to justify altering Green Belt boundaries through the Local Plan process.

1.2 The findings of this assessment were set out in the Rossendale Green Belt Review (November 2016). Following the Rossendale Local Plan Examination held in October 2019, LUC were asked to provide the following additional information in relation to Green Belt issues.

1. Sensitivity check of the NPPF Green Belt Purpose 4: To preserve the setting and special character of historic towns. The purpose of this is to check whether the outcome of the Green Belt assessment would be different, if it was assumed there are no historic towns within Rossendale or neighbouring areas.
2. Assessment of potential harm to the Green Belt of releasing for development Allocation H71 - Land east of Market Street, Edenfield.
3. Assessment of potential harm to the Green Belt of releasing for development Allocation H72 - Land west of Market Street, Edenfield, in particular the cumulative harm of the three Green Belt parcels that make up H72 (these were assessed separately in the Green Belt Study (2016).
4. Assessment of potential harm to the Green Belt of extending Edenfield Church of England Primary School .
5. Assessment of the potential harm to the Green Belt of releasing for development Allocation H73 - Edenwood Mill, Edenfield.

1.3 This report sets out the findings of the findings of these additional assessments. The sensitivity testing of purpose 4 is set out in **Chapter 2** and the assessments of harm to the Green Belt of the proposed allocations H71, 72, Edenfield School Extension and 73 are set out in **Chapter 3**.

Chapter 1

Introduction

Rossendale Green Belt Study
January 2020

1.4 This report does not repeat the methodology for undertaking the Green Belt study as that is contained in full the original Green Belt Study 2016 and should be read in conjunction with this report.

Chapter 2

Sensitivity Testing Purpose 4

See Action 8.5

Chapter 3

Assessment of harm of release of H71 (Action 14.2), H72 (Actions 14.3iii;iv) and H73 (Action 14.4)

3.1 As requested by the Council, the following chapter provides commentary on the potential harm to the Green Belt associated with:

- The release for development of Allocation H71 - Land east of Market Street, Edenfield.
- The release for development of Allocation H72 which was assessed in the 2016 Green Belt Study as three separate parcels.
- The extension of Edenfield Church of England Primary School to the east of Market Street.
- The release for development of Allocation H73 - Edenwood Mill, Edenfield.

3.2 These are discussed in turn below:

Release for development of Allocation H71 - Land east of Market Street, Edenfield

3.3 The 2016 Green Belt Study assessed this area of Green Belt as part of a much larger area east of Market Street in Edenfield (Parcel 41) and did not recommend that it should be released. This is an existing brownfield site used for storage purposes, a part of which lies within the Green Belt.

3.4 The inset edge of Edenfield as it extends north along the eastern side of Market Street from the settlement core, is for the most part a consistent single dwelling in depth, with a homogeneous character. The site in question has uses which adversely affect the character of the Green Belt, but it is still distinct in form from the inset settlement edge, and its release could adversely affect the strength of the adjacent Green Belt, by introducing a containing influence on land to the north and south. Therefore the site, in keeping with the 2016 assessment parcel of which it formed part, is still considered to make a strong contribution to preventing sprawl of the large built-up area (Green Belt purpose 1).

The release for development of Allocation H72 which was assessed in the 2016 Green Belt Study as three separate parcels.

3.5 Allocation H72 was assessed in the 2016 Green Belt Study as Parcels 39, 43 and 44 and these parcels were identified as having potential for release. Parcel 44 forms the southernmost section, 43 the central section and 39 the

Chapter 3

Assessment of harm of release of H71 (Action 14.2), H72 (Actions 14.3iii;iv) and H73 (Action 14.4)

Rosendale Green Belt Study
January 2020

northern section of Allocation H72. As was stated in the 2016 report, Parcels 43 and 39 were, when considering harm to the Green Belt purposes, assessed with the assumption that development would progress from south to north. Contribution to Purpose 3: safeguarding the countryside from encroachment increases from Parcel 44 to Parcel 43, with the weaker contribution of the former reflecting its stronger association with inset settlement edges (both to the south and east). However, a limiting factor on contribution to Purpose 3 for all three parcels is the containing influence of the inset development along the B6527 to the east and the A56 to the west, with the two roads converging at the northern end of the site. This containment means that contribution to Purpose 1 is a consistent moderate for all three parcels.

3.6 When considering the impact on the Green Belt purposes, it is important to recognise that the size of a release does not have a direct correlation with the harm caused. In broader terms it is to be expected that a larger development will typically have a greater impact on landscape and views, and potentially on other sustainability considerations, but the assessment of harm to the Green Belt as a spatial planning designation is focused on the relationship between urban development and countryside. In this respect all of the H72 site has boundaries which would prevent any significant impact on the wider Green Belt and hence the release of the Allocation as whole will not lead to any greater increase in harm than that identified in the original 2016 Green Belt assessment.

The extension of Edenfield Church of England Primary School to the east of Market Street.

3.7 In order to cater for the provision of new housing and inhabitants associated with Allocation H72, the Edenfield Church of England Primary School may need to be extended. No plans have been agreed for the site but it is understood that it would involve a one classroom extension to the existing school. It has therefore been assumed that the existing hardstanding sports pitch, immediately to the rear of the school (which is in the Green Belt) would be partially built on and that a replacement pitch would need to be built further east into the wider playing field.

3.8 It is understood that the area being considered for development would be considered through demonstration of “very special circumstances,” rather than being allocated as part of the Local Plan.

3.9 The grounds to the east of the inset buildings of Edenfield Primary School are located in an area assessed as Parcel 38 in the 2016 Green Belt Study, which rated moderate in terms of contribution to Purposes 1 and 3. The area proposed for development at approximately 0.1ha was too

small to have been identified as a potential lower harm sub-area in the 2016 study.

3.10 The playground is contained by inset buildings on two edges, and enclosed by dense tree cover on a third side, so the impact on the integrity of the adjacent Green Belt would be negligible. The creation of a replacement playground within the Green Belt part of the school grounds would constitute only a limited impact on Green Belt openness, and would have little urbanising impact given that the area is already part of school site and therefore functionality associated with the inset settlement. It is therefore considered that the proposed school extension would not lead to significant harm to the Green Belt.

The release for development of Allocation H73 - Edenwood Mill, Edenfield

3.11 The Allocation H73 forms part of the larger assessed Parcel P49 in the 2016 Green Belt Assessment. The site corresponds to the western part of Parcel 49, which was assessed in the 2016 assessment as performing moderately against Purpose 1, strongly against Purpose 2 and moderately against Purpose 3, so impact on the narrow Green Belt gap between Edenfield and Stubbins was the principal concern.

3.12 The open central area within site H73, contained to the east, west and south by tree belts, is currently well-screened on approach from Stubbins, or in views from the intervening M66, so these trees within the parcel make an important contribution to preserving perceived settlement separation. If development was to result in the opening up of views into the site, the harm to Purpose 2 would be significant. If, however, development was to preserve the screening tree cover as part of the Green Belt, consistent with the treatment of trees adjacent to the motorway, along the western edge of Edenfield, harm would be reduced.

3.13 Crossing the A56 would constitute moderate sprawl of the large built-up area (Purpose 1), but the trees, and beyond them the motorway and brook, are clear boundaries that would define the new urban edge. The derelict mill lies to the south of tree belt, where Green Belt release would cause higher harm, but this could constitute the redevelopment of an existing building.

APPENDIX 3

HERITAGE IMPACT ASSESSMENT (Growth Lancashire)

To Nathaele Davies
From Ian Bond – Growth Lancashire
Subject Conservation Comments
Date 30 October 2020

Ref: H72/Edenfield

Proposal: Strategic Housing Site Allocations – Edenfield

Site Address: Land west of market Street, Edenfield

Site / Location

The site relates to a large area of open land north of Edenfield, bounded to the east by Blackburn Road and Market Street and in the west by the A56. The land is a strategic housing allocation (H72) which was originally made up of four different parcels of land identified in the SHLAA.

Designated heritage assets

Edenfield Parish Church lies off Market Street adjacent to the northern parts of the allocation. The Church dated 1778 with tower dated 1614 at the western end is a Grade 2* Listed Building (List Entry No 1318084).

Legislation

The principle statutory duty under the Planning (Listed Building and Conservation Areas) Act 1990 is to preserve the special character of heritage assets, including their setting. LPA's should, in coming to decisions, consider the principle Act. Which states the following;

Listed Buildings - Section 66(1)

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Planning Guidance and Policy

NPFF

In determining planning applications LPA's should take account of;

- a. The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

- b. The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c. The desirability of new development making a positive contribution to local character and distinctiveness.

P.193 states that when considering the impact of proposals on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be applied. This is irrespective of whether any harm is identified as being substantial, total loss or less than substantial harm to its significance.

P.195 where a development will lead to substantial harm to an assets significance LPA's should refuse consent unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or all the following apply;

- a) the asset prevents all reasonable uses of the site; and
- b) no viable use for the asset can be found in the medium term; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is possible; and
- d) the harm or loss is outweighed by the benefits of bringing the site back into use.

P.196 identifies that where a proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

P.197 states that the significance of non-designated heritage assets should be taken into account in determining development proposals. In weighing applications a balanced judgement will be requires having regard to the scale of any harm/loss and the significance of the heritage asset.

P. 200 states that LPA's should look for opportunities for new development within CA's and within the setting of heritage assets to enhance or better reveal their significance. Proposals which preserve those elements of the setting that make a positive contribution to the asset should be treated favourably.

Local Plan

Rossendale Core Strategy Development Plan Document (2011-2026) - Policy 16 Preserving and Enhancing Rossendale's Built Environment.

The Council will protect, conserve, preserve and enhance Rossendale's historic built environment including Listed Buildings, Conservation Areas, Registered Parks and Gardens, Scheduled Ancient Monuments, archaeological sites, historic landscapes and locally identified buildings, sites and structures. These

heritage assets all contribute to the local distinctiveness and character of the area.

This will be achieved by;

1. Promoting the positive management of the Borough's heritage assets, avoiding unnecessary loss and requiring appropriate mitigation of any negative impacts.
2. Extending the heritage protection for areas and/or buildings worthy of retention, conservation and enhancement through the designation of appropriate additional Conservation Areas and Listing.
3. Enhancing the value of Rossendale's historic built environment by carrying out Conservation Area Appraisals, implementing Conservation Area Management Plans and public access measures.
4. Protecting significant urban public realm (space) from development.
5. Ensuring that all development is: a. Located in a way that respects the distinctive quality of the historic landscape and setting and retains or enhances the character and context. b. Of a high standard of design, reinforcing the local distinctiveness of Rossendale
6. Encouraging innovative new design(s), where it responds to the character, scale and setting of historic buildings and areas.
7. Maximising the potential for the re-use of buildings of historic or local interest for appropriate uses to ensure their future longevity. However where this is not possible/appropriate, considerate and sensitive redevelopment will be supported, subject to advice from the Council's Conservation Team and English Heritage.
8. The Council will support those schemes and proposals which contribute to conservation-led regeneration, particularly where they exploit the regeneration potential of the textile mill-towns and traditional architecture of rural villages within Rossendale.

Assessment

The LPA in this instance is required under the P (LBCA) Act to have special regard to the desirability of preserving heritage assets, which includes their setting. Recent High Court judgements identify the need to give considerable (great) weight and importance to that duty. I am also mindful that P.193 - NPPF states that the more important the asset (Edenfield Parish Church is a Grade 2* LB), the greater the weight should be applied.

I confirm that I visited the site and surrounding area on Wednesday 28 October. I have also read through/considered the information provided to me including the HIA map/drawing previously produced.

I regard the key heritage issues for the LPA to consider, in relation to the housing allocation, to be as follows;

1. The potential impact of the future housing on the contribution made by the setting to the significance of Edenfield Parish Church.

2. whether there would be any, unjustified, harm to the setting of any non-designated heritage assets adjacent to the site.

Significance of the Heritage Asset

English Heritage (now Historic England) issued its Conservation Principles: Policies and Guidance in 2008 which set out the practice of recognising the heritage value so that informed decisions can be made, helping to manage changes to the historic environment in a coherent and sustainable way. The Conservation Principles sets out four main aspects of significance (or values) to be: evidential, historical, aesthetic and communal.

Historic England's guidance Statements of Heritage Significance, published in 2019 sets down the levels of significance. The purpose of identifying these values allows a proper consideration of the impacts of any work or proposals on them. Assessments of significance however depend on experience and judgement.

Significance is normally measured by assessment under the values contained in the *2008 HE Conservation Principles* and relate to historical, aesthetic, evidential and communal values. The NPPF identifies significance as being the historic, architectural, archaeological and artistic values. The NPPF (Annex 2: Glossary) defines significance as "the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage assets physical presence, but also from its setting."

The accepted levels of significance can be defined as being; exceptional – generally reserved for Grade 1 Listed Buildings and Scheduled monuments; high – for heritage having national importance, demonstrating more than special interest; medium – for heritage of regional importance; low – for local significance that makes a positive contribution to the understanding of the asset, area, group or setting in the local context and neutral - where the significance is unimportant, making little or no contribution to the special interest of the asset or area.

Edenfield Parish Church is of high/exceptional significance. The significance is evidenced in its age, layout and built form. The Listing description identifies that it is a rare example of a C18 Chapel of ease and is significant because of its early C17 stone tower. Architecturally it is a has a simple rectangular form with a six bay nave characterised by round headed ground floor windows with smaller rectangular ones, above on the first floor. Pevsner described the Church as being exceptionally unspoilt.

In terms of its setting the Church has an east west axis with the earlier tower at the western end. The grave yard extends out to the west and is bound by a stone wall along Church Lane and a small brook to the south. The southern boundary is wooded. The former Rectory accessed off Church Lane, lies within an area of woodland, to the west.

From my visit I noted that the Church is prominent from off Burnley Road/Market Street when approaching from the north and from along the smaller Church Lane. From the south the Church is screened by frontage development and wider or more distant views are filtered by the woodland which lies along the southern boundary, to the west and north-west.

Historic England's advice on setting is contained in its Planning Note 3 (second edition) entitled *The Setting of Heritage Assets* (2017), describes the setting as being the surrounding's in which a heritage asset is experienced and explains that this may be more extensive than its immediate curtilage and need not be confined to areas which have public access. Whilst setting is often expressed by reference to visual considerations it is also influenced by the historic relationships between buildings and places and how views allow the significance of the asset to be appreciated.

The historic mapping from 1845 shows the Church within a cluster of frontage development including the Church Endowed School opposite. The Church yard enclosures along Church Lane and the brook together with the woodland are evident. By the 1890's the wooded enclosure to the Church and grave yard is well developed as is the reference to the Rectory to the west along Church Lane and Chapel House on the corner with Burnley Road.

In this context, historically I feel the setting of the Church is somewhat confined to the immediate Church, grave yard enclosure and former Rectory to the west and the small group of late C18 and C19 buildings which are present along the Burnley Road frontage. This immediate area, in my view contributes to the significance of the listed building. I would consider this area makes a positive contribution to how we appreciate the Church and is of a low significance.

The open parcels of land to the north of Church Lane and south beyond the immediate Church enclosure has little of no significance to the historic setting. Whilst some filtered views are obtained of the west tower from the land to the south, because of ground levels, the further south you go any glimpsed view soon disappears. In my view the limited views obtained from these areas of open land do not add to the significance of the Church.

Impact on the setting

Given the above, the areas sensitive to change around the Church are likely to be those areas immediately along the east west corridor along Church Lane, where the Church and its west tower can best be experienced. In this context so long as the woodland enclosures remain in place (and are strengthened) to the north and south of the Church yard enclosure any impact from new housing will likely to be minimal.

Given that the area south of the Church grounds contributes little to the overall significance of the Church the level of harm is confined to those reductions in the glimpsed views of the west tower/Church through the trees. In this context I regard the harm to be low/negligible. This level of harm only affects the norther part of the larger site and this diminishes the further south you go.

I feel this level of harm could be mitigated by;

- Carefully planning the layout of the housing parcels to allow those glimpsed views to continue i.e. by aligning the principle road(s) along a north-south or north east – south west axis.
- The strategic positioning of POS along the sensitive woodland area south of the brook/Church enclosure.
- Augmenting the existing tree planting in the woodland areas.

Impact on Non Designated Heritage assets

A number of pre-existing late C18 and C19 properties lie within or close to the allocation including Chatterton Hey (Heaton House), Mushroom House and the former Vicarage. I have not carried out a detailed survey/study of these properties.

Paragraph 197 of the NPPF states that the significance of non-designated heritage assets should be taken into account having regard to the scale of harm proposed to their significance.

Under the ICOMOS guidance non designated buildings can only ever be assigned a low or negligible significance. As such even total demolition would only cause very low levels of harm. The contribution made by the setting to non-designated assets by reason therefore should carry no weight in a LPA judgement. I think this is the case here and whilst the housing allocation will likely impact on the amenities of those dwellings which border the site this does not equate to loss of significance in heritage terms.

On this basis I don't think any adjustments would be warranted in relation to the non-designated heritage assets.

Summary

Any level of harm, even very low levels, to the significance of heritage assets is regrettable and the LPA will need to give this due weight in its planning judgement. It is down to the decision maker to consider the wider public benefits of the housing allocation against any harm in its planning balance, remembering that great weight should always be given to any identified harm to a designated heritage asset). More information on public benefits is included in the Planning Practice Guidance and can be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8).

Using the ICOMOS assessment methodology matrix I find the level of impact to the setting of Edenfield Parish Church to be in the very low/negligible. The level of harm will need to be assessed as being 'less than substantial' under P.196 of the NPPF.

Conclusion / recommendation

As I am required to do so, I have given the duty imposed by s.66(1) of the P(LBCA) Act 1990 considerable weight in my comments. NPPF Paragraph 193 states that great weight should be given to the conservation of heritage assets regardless of the level of harm. High Court decisions have been clear that lower levels of harm does not equate to a lesser objection given the principle duty under the Act is to preserve.

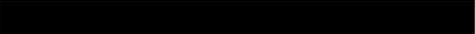
On the evidence provided and from my own site visit I conclude that the housing allocation will cause only a very low level of harm to contribution made by the setting to Edenfield Parish Church. This only affects the area immediately south of the wooded enclosure to the Church and grave yard. As indicated above I think this level of harm could be mitigated by clever design of the housing layout.



Ian Bond
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APPENDIX 4

LETTER FROM PLANNING AGENTS FOR H72

(Land to West of Market Street, Edenfield)

28th January 2021

Anne Stora
Forward Planning
Rossendale Borough Council
The Business Centre
Futures Park
Backup
OL13 0BB

Sent by email

Dear Anne,

**Joint Developer Response to Matter 14.3(vi) on Schedule of Actions
Delivery Trajectory of Edenfield Allocation**

This letter provides a joint response from the three developers involved with the Edenfield Allocation to Action 14.3 (vi) from the Councils Schedule of Actions, dated 14th November 2019 (Ref: EL6.001), which the Council requested developer input on by email on 14th January 2021.

For avoidance of doubt the three developers/ landowners are as follow, as signed at the foot of this letter:

- Taylor Wimpey (central parcel) – represented by Pegasus Group;
- Peel L&P Group (northern parcel) – represented by Turley;
- Anwyl Land (southern parcel) – represented by Hive Land and Planning;

This action relates specifically to the Edenfield allocation and requires a:

"Note setting out a clear timeline on the delivery trajectory taking account of the different stages (e.g. masterplan agreement, design code, approval of planning application) that would lead to the completion of the first units in 2021; to be done in conjunction with the landowners".

At the outset it must be noted that the timeframes for the adoption of the Local Plan and Masterplan/ Design Code are largely out of the developers' control and therefore difficult to estimate.

Indeed, delays to the Local Plan and the Council's publication of additional evidence have already meant that completion of units in 2021 is no longer feasible as suggested in the action and in the Council's most recent trajectory (Ref: EL4.14, dated October 2019).

As such, we provide estimated timescales for the Local Plan and Masterplan adoption based on our latest understanding and correspondence with the Council.

We then provide more realistic timeframes for application submissions and completions based on our current application strategies and build programmes for each parcel.

This should be read as an update to earlier responses to EL4.014 in October 2019, and the original MIQ 19a (ii) in August 2019.

Timescales for Local Plan and Edenfield Masterplan/ Design Code Adoption

The developers met with the Council on 11th March 2020, where the following timetable and procedure was out forward for the production of the Masterplan and Design Code.

DESIGN | ENVIRONMENT | PLANNING | ECONOMICS | HERITAGE

Queens House | Queen Street | Manchester | M2 5HT
T 0161 393 3399 W pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus house, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

RBC	Draft specification and circulate	by Friday 20 th March
All	Respond with comments	by Friday 27 th March
?	Procure consultants	by Thursday 9 th April
Consultants	1 st Draft of Masterplan	by Friday 24 th April
DC Committee	Sign off Masterplan	?

This programme slipped due the delays to the wider Local Plan (and publication of associated evidence/ actions) and the ongoing effects of the pandemic; with the Council agreeing in Autumn 2020 to let the developers provide a draft of the brief to maintain momentum, which we have been working on over recent months.

This document has now been finalised and submitted to Officers alongside this letter.

Based on the timetable above this should allow the masterplan to progress in the coming 2-3 months, and proceed to committee by Summer 2021 (with a new meeting schedule to be confirmed from May onwards following the local elections).

In respect of the Local Plan adoption, we understand that Main Modifications will be consulted on in Summer 2021 with adoption to follow late 2021/ early 2022.

Accordingly, we have assumed adoption of the Masterplan and Local Plan by early 2022.

Timescales for Application Submission and First Completions.

Taylor Wimpey own the main central part of the allocation (with an indicative SHLAA capacity of 273 dwellings) on a freehold basis, and expect to submit a full planning application within 3-6 months of adoption of the Local Plan (i.e. Summer 2022). This should then allow permission to be granted in late 2022 with start on site in early 2023 and completions by the beginning of the 2023/2024 year.

Anwyl Land and Peel L&P are also intending to progress applications promptly upon adoption of the plan, but as things stand these are likely to comprise outline applications, with a period of marketing and Reserved Matters applications to follow.

That said both parties do have the option of bringing these sites forward themselves through their respective housebuilding arms, Anwyl Homes and Northstone.

Either way this should allow both to start on site in late 2023 with completions by the beginning of the 2024/2025 year.

The remaining Horse and Jockey parcel has an extant permission (Ref: 2015/0238) and is under construction and we understand this is largely complete as suggested by the Council.

Delivery Rates and Trajectory

In terms of delivery rate the Council have assumed 30 dpa across the full allocation, but Taylor Wimpey predict a rate of 38 dpa on their parcel alone based on current sales rates and data, without accounting for the other 2 parcels; and Anwyl also predict a rate of 30 dpa on their parcel.

Whilst we cannot accurately predict delivery across the full site we would suggest a maximum average rate of 60 dpa based on multiple outlets delivering simultaneously (two outlets delivering at slightly

reduced rates of 30 dpa each, or three outlets at 20 dpa each), which is eminently achievable given the nature of the site which has direct road access to all three parcels.

The total capacity of the site is likely to remain around 400 units. Based on the estimated capacities of each parcel, we estimate the site to be fully built out by 2030/31 instead of 2033/34 as anticipated by the Council, due to elevated delivery rates (we have assumed each will deliver 20 dpa from 2024/25, with Taylor Wimpey increasing to 38 dpa once the 2 smaller parcels are complete in 2028/29). Our suggested trajectory is set out below:

Fig 3 - Edenfield Trajectory

	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34
Council (Oct 2019 Position)	5	5	30	30	30	30	30	30	30	30	30	30	30	30	30
Developers (Jan 2021 Position)	5	5			38	60	60	60	60	38	38	36			

Finally, we would stress that based on our proposed rates, even if the development of this allocation was delayed further it would still make a contribution to five year supply (as long as it begins by 2025/2026) and would still deliver in full by the end of the plan period (as long as it begins by 2026/2027), which are the most important factors to the overall function of the plan, with individual year on year delivery less consequential.

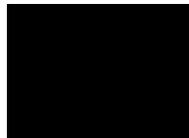
I trust the above representations are clear, but should you or the Inspector require any clarification or further information please make contact on the details below.

Yours sincerely,

Graham Lamb – Pegasus Group – on behalf of Taylor Wimpey:



Jenny Fryer – Turley – on behalf of Peel L&P Group



Justin Cove – Hive Land and Planning – on behalf of Anwyl Land



APPENDIX 5

COMMENTS FROM HIGHWAYS AGENCY RE SLIP ROAD AT JUNCTION 0, M66

Wed 13/01/2021 13:53
Hilton, Warren <[redacted]>
RE: Rossendale Local Plan: Site Allocation H73 - Edenwood Mill, Edenfield

To Storm Grimshaw
Cc Marsh, Kristian
Follow up. Start by 13 January 2021. Due by 13 January 2021.

No problem – the link works fine now.

From a Highways England perspective, we don't have any aspiration to introduce south-facing slip roads to / from the M66 at Junction '0' / Edenfield junction at this time, or as a consequence of accommodating the Local Plan growth envisaged. With that in mind, we would not specifically seek to include any wording associated with the policy for site H73 to safeguard land for that purpose.

Notwithstanding that, if Rossendale Council itself believes that land within the site allocation should be safeguarded for such a scheme anytime in the future, then we would have no object to that.

Hope that's useful – if you need to discuss anything, please do get in touch.

Kind regards,

Warren Hilton, Assistant Spatial Planner
Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD
Mobile: [redacted]
Web: www.highwaysengland.co.uk.