

Local Plan – Regulation 24
Main Modifications Consultation
Responses Received
Part 5 of 5 - Responses 89 - 98



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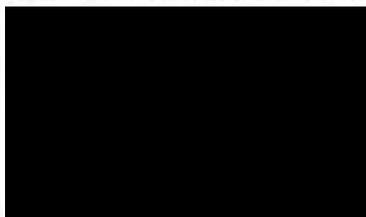
Classification of Responses

Response Number	Name	Reference Number	Allocation / Policy Reference (if applicable)	Nature of Response
1	National Highways	Numerous	Numerous	Numerous
2	Historic England	Numerous	Numerous	Numerous
3	Michael Watson (Renaker)	-	HS2.39	Request the allocation of a housing site
4	Carlo Latronico	MM009	H3	Objection
5	Jason & Sarah Menzies	MM009	H3	Objection
6	Ian Francis	PM-05	H34	Map Amendment
7	Deborah Brown & Andrew Morris	MM009	H3	Objection
8	Elizabeth & John Finn	MM009	H3	Objection
9	Public Health Planning	MM038	-	Support
10	Tracey McMahon	MM009	H3	Objection
11	Historic England	Errata	-	-
12	Homes England	-	-	-
13	Katrina & Steven Meager	MM009	H3	Objection
14	J & H Walton	MM009	H3	Objection
15	Nicholas Cousins		H34	Objection
16	Deena Burns	MM009	H3	Objection
17	Sarah & Andrew Hardman	MM009	H3	Objection
18	The Coal Authority	-	-	-
19	Julie Baugh	MM009	H3	Objection
20	Jack Woodworth	MM009	H3	Objection
21	Richard Holt	MM009	H3	Objection
22	Sophie Schofield	MM009	H3	Objection
23	Steve Hughes	MM009	H3	Objection
24	Maybern Planning	Numerous	Numerous	Numerous
25	Catherine Hodge	MM009	H3	Objection
26	Dave Terry	MM009	H3	Objection
27	Chris Brannan	MM009	H3	Objection
28	Chris Baugh	MM009	H3	Objection
29	Jack & Dorothy Norris	MM009	H3	Objection
30	Wendy Grimshaw	MM009	H3	Objection
31	Sharon Rumsam	MM009	H3	Objection
32	Margaret Burton	MM009	H3	Objection
33	Samuel Whittaker	MM009	H3	Objection
34	Mary & Roy Fletcher	MM009	H3	Objection
35	Gillian Whittaker	MM009	H3	Objection

36	The Limey Valley Residents' Association	MM009	H3	Objection
37	David Foxcroft	MM009	H3	Objection
38	Andy Ashworth	MM009	H3	Objection
39	Phil Hackett	MM009	H3	Objection
40	United Utilities	MM048	ENV9	Support
41	Lisa Hunt	MM009	H3	Objection
42	Sport England	MM009	H46	Support
43	David Schofield	MM009	H3	Objection
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46	Craig Scott	MM009	H3	Objection
47	Sally Dewhurst	MM009	H3	Objection
48	Mark Booth	MM009	H3	Objection
49	Christine Smithies	MM009	H3	Objection
50	Josh Sutton & Fiona Shaw	MM009	H3	Objection
51	Anne McKown	MM046	ENV7	Query / Support of closing paragraph
52	Home Builders Federation	Numerous	Numerous	Numerous
53	Carol Clement	MM009	H3	Objection
54	Nancy Kelly	MM009	H3	Objection
55	Mason Woods	MM009	H3	Objection
56	Philip & Gillian Amatt	MM009	H3	Objection
57	Dorothy Graham	MM009	H3	Objection
58	Adam Dawson	MM009	H3	Objection
59	Kevin Woods	MM009	H3	Objection
60	Natural England	-	-	-
61	Elizabeth Foy	MM009	H3	Objection
62	John Atherton & Lynne Lomax	MM009	H35	Concerns regarding methane, acid mine water and heavy metals contamination
63	Peter Stansfield	MM009	H3	Objection
64	Dylan Woods	MM009	H3	Objection
65	Sharlyn Mckittrick	MM009	H3	Objection
66	Planware (McDonalds)	MM038	R5	Objection
67	Grane Residents' Association	MM009	H64	Objection
68	Kevin Bent	MM009	H3	Objection
69	Jason Norris	MM009	H3	Objection
70	Kaye Abbott	MM009	H3	Objection
71	Christopher Turner	MM009	H3	Objection
72	Mrs Turner	MM009	H3	Objection
73	Maybern (Westchurch Homes)	Numerous	Numerous	Numerous

74	Morgan Woods	MM009	H3	Objection
75	Marie Charlton	MM009	H64	Objection
76	Jonathan & Sonia Lofthouse	MM009	H3	Objection
77	CBRE (United Utilities)	MM009	Cowm Water Treatment Works (prev. H69)	Gives supporting evidence for the re-instatement of the housing allocation
78	Christine Hereward	MM009	H3	Objection
79	Lead Local Flood Authority	Numerous	Numerous	Numerous
80	Victoria Holt	MM009	H3	Objection
81	CBRE (United Utilities)	MM009	H24	Support
82	Phil Nelson	MM009	H3	Objection
83	Rossendale Primary Care Network	-	-	Request infrastructure or financial support via s106/ CIL
84	SSA Planning (KFC)	MM038	R5	Objection
85	David Graham	MM009	H3	Objection
86	Edenfield Community Neighbourhood Forum	Numerous	Numerous	Numerous
87	Pegasus Group (Taylor Wimpey)	Numerous	Numerous	Numerous
88	Roman Summer	Numerous	Numerous	Numerous
89	Hall Park Residents' Association	MM028	NE2	Numerous
90	Hourigan Connolly	Numerous	Numerous	Numerous
91	Turley (Peel L&P)	Numerous	Numerous	Numerous
Responses received after 5pm on Friday the 15th of October 2021				
92	McDermott Homes	Numerous	Numerous	Numerous
93	Christine Catlin	MM009	H3	Objection
94	Gillian Whitehead	MM009	H3	Objection
95	Michael Bennett	MM009	H3	Objection
96	Chris Ashworth	MM009	H3	Objection
97	Caroline Mitchell	MM009	H3	Objection
98	Campaign to Protect Rural England	Numerous	Numerous	Numerous

Janis Thomas - Secretary
Hall Park Residents' Association



The Forward Planning Team
Rossendale Borough Council
The Business Centre
Futures Park
OL13 0BB

BY HAND

15 October 2021

Dear Sirs

Enclosed please find documentation, as listed below:

- Pages 1 – 6 Response to your request for input regarding “The Schedule of Proposed Main Modifications to the Local Plan (EL12.002)”.
- Page 7 List of twenty two (22) names in support of the above document.
- Page 8 List of eighteen (18) names in support of the above document.
- Page 9 List of twelve (12) names in support of the above document.

Yours faithfully

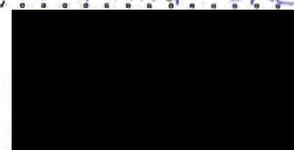


JANIS THOMAS
Secretary
Hall Park Residents' Association

Proof of Receipt from RBC
Futures Park

PRINT NAME HEATHER DALGLEISH

SIGNATURE



From: Martin Gillbanks (Chairperson) Hall Park Residents' Association

To: Forward Planning Team, Rossendale Borough Council, Business Centre, Futures Park, OL13 0BB

Delivered By Hand, on 15th October 2021

I am writing on behalf of the Hall Park Residents' Association, concerning:

The 'Schedule of Proposed Main Modifications to the Local Plan (EL12.002)'

We are responding to your request for input into 'whether the Local Plans will be passed to the Inspectors for their consideration as to whether the Local Plan is legally compliant or sound (i.e., positively prepared, justified, effective and consistent with national policy). The Inspectors have to be satisfied that the changes proposed will address the soundness issues he has identified'.

All points raised are regarding the parcel of land NE2.

NE2 is grazing and pasture land for Carterplace Stables, Carterplace, Acre, Rossendale, BB4 5BQ. The parcel of land NE2 is part of Carterplace Estate, Acre, BB4 5BQ on which 'Carterplace Stables' still reside. The postal address for Carterplace Stables is officially stated as 'Acre, Rossendale BB4 5BQ'.

Point 1

The document on page 10 of 255 Acre is mentioned explicitly as an example of "a smaller settlement or village".

This section explicitly classes Acre as being,

"Outside of the main urban area and service centres, there are many smaller settlements or villages with limited facilities. Examples include Acre and Cowpe".

The document then goes on to state,

"In the interests of sustainable development, growth and investment should be confined here (as stated in the same document to small scale infill and the change of use or conversion of existing buildings. Affordable housing development of an appropriate scale on the edge of a

rural settlement to meet a particular local need may be justified in accordance with national planning policy".

Acre is mentioned here as being 'outside the main urban area'. Acre is used as an example of a 'smaller settlement or village'.

It is worth noting that the parcel of land NE2 that resides in Acre is mistakenly described on page 20 of 255 of this document as being 'NE2 Land north of Hud Hey, Haslingden'. We feel this is more than an oversight, and we perceive this as misdirection. If this greenbelt land were given its correct geographical location as being in Acre, from the beginning of Rossendale Borough Council's attempts to remove NE2 from the greenbelt, more notice would have been taken at the beginning of this process.

If NE2 had been given its correct legal and legitimate address and location, it would have been afforded greater protection in light of the statements quoted from the document (EL12.002) as quoted above. NE2 Carterplace Acre must have greater protection as existing greenbelt land acts as a land separation between the town of Haslingden and the small village of Acre. In addition, this would afford Acre increased Government Legislation, as it is a 'small settlement or village'.

The legislation would afford NE2 Acre greater protection from improper and reckless overdevelopment as NE2 would be assured. In addition, as a 'small settlement or village,' the use of brownfield sites would be preferred. However, this statement of Acre's 'small village' status, made in the document on page 10, would render the remainder of this document dissonant to RBC's proposed future plans, as laid out in the RBC document (EL12.002) regarding the future use of NE2 its previous removal from the green belt.

Point 2

The document states on page 21 of 255 that green belt land would only be removed for a major project,

"In keeping with the priority to protect Green Belt and take forward robust boundaries for the future, only major schemes that will contribute significantly to meeting the Borough's needs for employment and housing, that have a strategic role, have been identified on Green Belt.

All allocations which will result in the release of Green Belt will need to provide compensatory benefits to the land remaining in the Green Belt".

The above passage implies that the parcel of land NE2 and its proposed removal from the greenbelt must be for the purpose of a major project. But as stated above and quoted from this document (EL12.002), the land is part of a 'small settlement or village', so it must not be subjected to major projects. So how are both criteria applicable to the same parcel of land NE2? As stated before, we feel this is being accomplished by RBC's persistent misrepresentation of this land NE2 as being located in 'Hud Hey, north of Haslingden' or even Hud Hey North of Haslingden, Acre. Neither of these addresses is the correct location of the parcel of land NE2. If this parcel of land NE2 were given its right location throughout this document, as part of the village of Acre (which the document itself says is a small settlement or village), NE2 would have greater protection criteria than if it were part of Haslingden, which is Acre's nearest larger town.

Point 3

On page 15 of 255, the parcel of land NE2 in Acre is again stated as 'north of Hud Hey, Haslingden'. Again, this misrepresented the parcel of land NE2 proper location within a 'small village or settlement'. We feel that if the correct address had been used for this parcel of land, it would have allowed NE2 to be correctly recognised as greenbelt separation from the outset. If this had been the case, we feel it would not be eligible for removal from the green belt as the land is most clearly within a small village and acting as a green belt separation between Acre and Haslingden. It is of paramount importance within the greenbelt preventing the unecological and environmental problem of urban sprawl, as it is the southernmost parcel of land within the village of Acre, on whose southernmost edge lies Acre Villages southern border, being owned by Carterplace stables Acre but once been part of The Carterplace Estate.

This same problem is also applicable to a reference to NE2 on page 22 of 255. Once again, NE2 is referred to as 'NE2 Land north of Hud Hey, Haslingden'.

Point 4

On page 123 of 255 and referring to the parcel of land NE1, the document states,

'The land in the north of the allocation has ecological value as a steppingstone habitat. As such, there should be no adverse impacts on this habitat as a result of the development, and mitigation measures will be required, and advantage taken to ensure that the grassland is improved and retained as a wildlife corridor'.

The above statement must also be valid for the parcel of land NE2, as noted in our last submission to RBC, regarding deer using NE2 at night to cross the A56.

Point 5

Page 112 of 255 reveals that the previously named 'Land north of Hud Hey, Haslingden' is proposed to be changed to 'Land north of Hud Hey, Acre'. The document fails to recognise that the parcel of land NE2 should be called "Land at Carterplace, Acre", as this is its correct postal address. It has never been known as the land north of Hud Hey, Acre. It is, in real terms, "South Acre Village". This is also the case for pages 123 -125, the site-specific policy for the land at North of Hud Hey, Acre. This statement is again misdirection since when was our capital city called 'land north of Surrey, London', no that is not the case, London is called London and Acre, therefore, should just be called Acre. Everywhere is the land north of somewhere, but this is never mentioned in its title.

Point 6

The document states on page 123, point b, regarding the plot of land NE2 that,

"b) development should avoid the northern and eastern boundaries of the allocation and these areas should be planted with native-species trees in order to create a buffer and provide a new Green Belt boundary".

I would like to know the process of moving the boundary of Acre

Our residents are concerned that the use of the word 'should' in this statement is open to abuse. We all 'should' drive at 30mph when the road signage tells us to, but do we? The use of the word 'should' is very problematic in the context of this statement, as myself and members of the Hall Park Residents Association feel it holds little legal validity to its instructions adherence. The word 'should' in this context is almost meaningless, a throw-away word and immediately makes the reader think that there is a possibility that there are

unspecified grounds on which it is not necessary to comply with the request of the statement. It leaves an unknown amount of wiggle room for the development of this now greenbelt land.

Furthermore, the use of the word 'should' implies a very lackadaisical approach to any penalty for non-compliance, as on what grounds does the word should have any power of enforcement, morally or lawfully? We request that this be changed to the word 'must', especially as some of our residents' park homes on the southern boundary have bedroom walls only 3.5 metres from the proposed employment site. How many metres is the correct amount of avoidance be? How big is a buffer zone? This sentence is fluff and wind, with no specification to distance requested.

Conclusion

We feel that the compensation measure put forward, pages 123-125, in the specific plan for NE2 are of no value for those most affected by the proposed development to Parcel NE2; the elderly and infirm residents of Hall Park, the park's average age, is 78. In addition, cycle paths and walkways are of no value to those most affected.

As stated on page 23 of the document EL12.002,

"All improvements are expected where possible to be located in the same area of Green Belt to ensure local residents who are most affected by the loss of the Green Belt receive the benefit from the compensatory improvements".

Please could you furnish us with a list of compensation measures and/or improvements to benefit the ageing Hall Park residents? Once again, a none-specific term is used 'where possible'; this gives no assurance to those most affected by this NE2's removal from the greenbelt. Our residents may well see no compensation that is of value to them.

We wish to be noted that the steppingstone habitat to the north of Carterplace, Acre, the wildlife corridors at Winfield's and the Rising Bridge Roundabout are grassland habitats. Even though not documented, we feel that given the number of existing trees (all the trees on Hall Park bearing a TPO order) and deer travelling through Carterplace/ Bussell Lane/Top O'th Bank, the green belt separation that is the parcel of land NE2, be legitimised as a newly created PROW that would be a woodland habitat corridor and help to conserve the historical importance of Acre, Carterplace (including the residences on Hall Park and 'Hall Park's Grade

II Star Listed Building' which would be more appropriate to conserving the history of both Acre and Carterplace.

Finally, we would draw your attention to page 20, which states,

"Some smaller housing sites have been allocated on land released from the Green Belt, but only where the land is previously developed. In keeping with the priority to protect Green Belt and take forward robust boundaries for the future, only major schemes that will contribute significantly to meeting the Borough's needs for employment and housing that have a strategic role have been identified on Green Belt".

As there is a row of well-established trees between the existing trading estate and the greenbelt land of NE2, we feel that if a historic natural boundary exists between the parcel of land NE2 and the current industrial estate, then this could/should not constitute an extension to a 'previous development'. We presume that these trees must have TPO orders on them, as do our trees at the north of NE2. We also see this as removing an existing 'robust boundary' and the disruption of an existing and establishing wildlife habitat.

If your position is as stated to "take forward robust boundaries for the future", then we ask that of the utmost importance you categorically stipulate that if there are future plans for the parcel of land NE2 and its removal from the greenbelt, the document EL12.002 must-read that there "must be protected green belt boundary to the northern border of NE2 where it meets the southern border of Hall Park Acre" and give a specific distance from the southernmost homes on Hall Park. As stated in the previous correspondence to RBC, some park homes have bedroom walls only three meters away from the existing green belt land. In addition, these properties are park homes made from timber that give very little protection from noise pollution, which would be relevant if NE2 were removed from the greenbelt and used for industrial purposes.

Yours sincerely

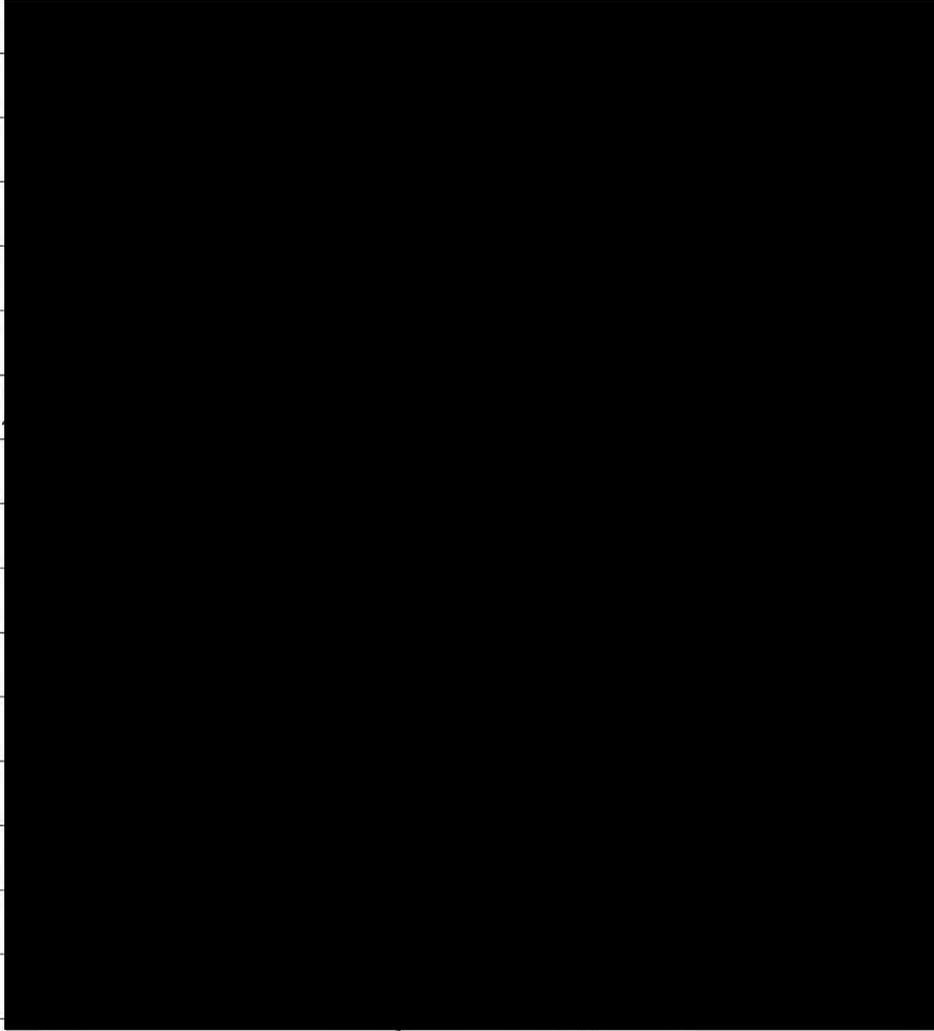
A black rectangular redaction box covering the signature of Martin Gillbanks.

Martin Gillbanks

On behalf of Hall Park Residents Association

Hall Park Residents Association
Acre, Rossendale, BB4 5BQ

With reference to the document from Chairperson Martin Gillbanks, dated 15 October 2021, relating to Land Area NE2 and the change of use from Green Belt to industrial use, I append my name below in full support.

Name	Address	Signature
SHELAGH	HEAP	
K-J-SIMPSON	-	
T MAC DONALD		
R ACTON		
M ACTON		
G. MATHEWS		
P LISTON		
S HAMBLETON		
S. Pollock		
M. Paul Hill		
D. DRINKWATER		
A DRINKWATER		
P HARRISON		
S. WILSON		
M. WILSON		
Kevin Bartram		
e CHRISTINE THRELFALL		
THRELFALL		
BARRY THRELFALL		
ANDREW HEAP		
JOANNE ROSCOW		
J. CLARKSON		
JM		

Hall Park Residents Association
Acre, Rossendale, BB4 5BQ

With reference to the document from Chairperson Martin Gillbanks, dated 15 October 2021, relating to Land Area NE2 and the change of use from Green Belt to industrial use, I append my name below in full support.

Name Address Signature

JANIS THOMAS
STUART BERRILL
NORMA BERRILL
ROBERT MASSEY
CAROL McLEAN
MICHAEL McLEAN
LIPKORO BRAVEN
SIE BRAVEN
N HALL PARK
~~RAY~~ ELANE GREEN
RAY GREEN
FRANK THOMAS
GLENICE JAROSZ
J A DAMPIER
S JAMSON
V. A. Freeman
P Lehman
DR A GILLBANKS



Hall Park Residents Association
Acre, Rossendale, BB4 5BQ

With reference to the document from Chairperson Martin Gillbanks, dated 15 October 2021, relating to Land Area NE2 and the change of use from Green Belt to industrial use, I append my name below in full support.

Name Address Signature

Philip Bounkerswe



SACK KAY

b. d. Nail

Wood

Geo O'Leary



SUE SMELLOR

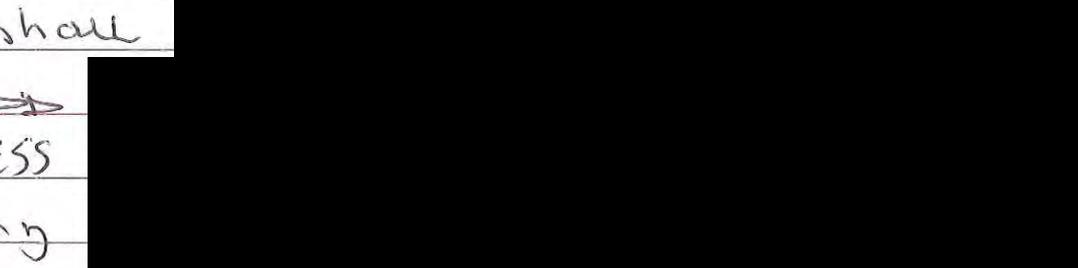
Rosmary Dawson



WYNNE HOLMES

Sylvia Henshall

Annette DODD



DALE FAIRLESS

Bar O'Mahony

ROSSENDALE LOCAL PLAN (2019-2036)

MAIN MODIFICATIONS CONSULTATION

REPRESENTATIONS ON BEHALF OF MILLER HOMES

LAND AT CLOD LANE, HASLINGDEN

DATE:

15 OCTOBER 2021

Report Drafted By	Report Checked By	Report Approved By
DC	DM	DC
12.10.2021	14.10.2021	14.10.2021

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Appendices

Appendix 1	Extant Planning Permission (Ref.: 13/2/2758) Approved Layout.
Appendix 2	Indicative Site Layout Plan.
Appendix 3	Extract from Preliminary Land Stability Assessment Report - Zoning Plan.
Appendix 4	'Zone A' Deliverable Layout Plan.

1. INTRODUCTION

1.1 Rossendale Borough Council has issued its Schedule of Proposed Main Modifications for comment. The consultation will end on Friday 15th October 2021. The key documents subject to the current consultation are:

- i) Schedule of Proposed Main Modifications to the Publication (Regulation 19) Draft Plan (September 2021).
- ii) An accompanying schedule details minor Additional Modifications which include factual updates, corrections and formatting changes.
- iii) A schedule of changes to the Policies Map (August 2021).

1.2 The consultation documents also include a Housing Update dated August 2021.

1.3 We are instructed by Miller Homes (hereafter referred to as our client) in respect of their land interests at Clod Lane, Haslingden (hereafter referred to as the site) as broadly outlined in red below at **Figure 1.1**.



Figure 1.1 The Site

**Rossendale Local Plan (2019-2036) - Main Modifications Consultation
Representations On Behalf of Miller Homes
Land at Clod Lane, Haslingden**

- 1.4 As can be seen, the site is bound on three sides by development: to the north by Tor View School, to the east and south by residential properties along Linden Park Road and Hilltop Drive respectively. The western boundary is formed by Clod Lane.
- 1.5 The background to these representations is that the site benefits from an extant planning permission (Application No. 13/2/2758 granted on 25th October 1972 for 231 dwellings). Amongst other things, this led to the inclusion of the site in the Council's housing land supply figures. The site has been the subject of numerous submissions by others to the previous consultation stages of the Local Plan, up to and including the Examination in September 2019.
- 1.6 The latest of these submissions were made by DPP under cover of their letter dated 27 April 2020 on behalf of the owners, Linden Park Developments Ltd and their then partner DMGECO Ltd.
- 1.7 Neither of the parties with an interest in the land at that time are housebuilders.
- 1.8 The submissions followed a request from the Inspectors as to the deliverability of the site for housing, which formed part of a wider Schedule of Actions following the Inspectors' interim report made following the Examination. The following Actions are relevant to the site:
- **Action Ref No. 19.4** – List of extant permissions in housing land supply paper – addition of land off Manchester Road and Clod Lane, Haslingden – Produce a note setting out justification of why this should be included in housing land supply and provide further evidence to demonstrate that the site will resume delivery in year 6.
 - **Action Ref No. 19.8** – Note on developable sites (i.e., year 6 onwards) setting out information on:
 - land ownership
 - commitment from landowners including the date at which the commitment was made and timescales for delivery.
 - evidence that a start date could be made at the date anticipated
- 1.9 Following receipt of DPP's detailed submissions, the inspectors wrote to Rossendale Council on 30th June 2021. Paragraph 45 of that letter contains the following:
- “45 The Council's list of extant permissions includes 50 dwellings on land at Clod Hall Lane in Haslingden. On balance, based on the evidence before us, we are not persuaded that there is sufficient certainty at this stage to conclude that the scheme will come forward by 2035/36. The site has technical issues relating to land stability which require further investigation and the fallback position of the permission has been disputed. Clod Hall Lane should therefore be excluded from the extant permissions source in the housing supply calculations.”*
- 1.10 The purpose of our representations is to make the Council and the Inspectors aware of a significant change in circumstances in relation to the site. Our client, an established national

**Rossendale Local Plan (2019-2036) - Main Modifications Consultation
Representations On Behalf of Miller Homes
Land at Clod Lane, Haslingden**

housebuilder, with a track record of delivering major residential schemes, often on complex sites, is now under contract with the site owners to deliver a phased residential development. The site could be delivered in its entirety within the Plan period for around 138 homes, with a minimum of 50 homes being delivered within the 1 to 5 year period.

1.11 Accordingly, our client objects to the proposed removal of the site from the Council's housing supply figures.

1.12 In summary terms our client's **OBJECTIONS** are as follows:

- A legitimate fall-back exists in the form of an extant planning permission that is capable of being developed in principle, which has not been given sufficient weight in the consideration of the site.
- New evidence is available which weighs in favour of the delivery of homes on site in the form of a national housebuilder being under contract to deliver homes on site.
- Our client objects to the designation of the subject site as Green Belt. The subject site should be removed from the Green Belt and allocated for housing.
- If the Inspectors consider that the site should remain as Green Belt, our client considers that the site should be re-introduced into the Council's supply figures for a minimum of 50 dwellings with potential for a development of around 130 dwellings within the Plan period.

1.13 The basis of our client's **OBJECTIONS** is set out in the following chapters of this submission.

2. NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (2021) CONTEXT

2.1 A revised version of the National Planning Policy Framework (hereafter referred to as the Framework) was published on 20 July 2021. Whilst the Framework remains largely unchanged from the previous version in relation to the relevant considerations for the site, the new version is referred to throughout our representations to reflect the latest national policy position. The following extracts are relevant to our representations and are reproduced below for ease of reference together with commentary where necessary:

SECTION 3 - PLAN MAKING

2.2 Paragraph 15 of the Framework states that:

“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings”.

2.3 Paragraphs 16 a) 16 b) of the Framework state that Plans should:

“a) be prepared with the objective of contributing to the achievement of sustainable development;

“b) be prepared positively, in a way that is aspirational but deliverable;”

2.4 Paragraph 20 states that inter alia:

“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;”

2.5 Paragraph 22 states that:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”.

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2.6 Paragraph 31 states that:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.

2.7 The Examination of Plans is dealt with in Paragraph 35 of the Framework:

“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”.*

2.8 It should be noted that to be found sound a Plan must meet all four tests of soundness.

SECTION 13 - GREEN BELT

2.9 Paragraph 138 of the Framework establishes that Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*

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e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.10 Paragraph 140 and 141 of the Framework states that:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground”.

2.11 The importance of promoting sustainable patterns of development is a focus for Paragraph 142 of the Framework:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt

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or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.

2.12 Paragraph 143 sets out considerations when defining Green Belt boundaries:

“When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

3. LAND AT CLOD LANE, HASLINGDEN

INTRODUCTION

3.1 In light of the foregoing, our client **OBJECTS** on three counts:

- Firstly, to the designation of land at Clod Lane, Haslingden as identified at **Figure 1.1** as Green Belt.
- Secondly, to the contention that the site will not be delivered within the Plan period.
- Thirdly to the proposed removal of the site from the Council's housing land supply.

3.2 In support of our submissions, we ask that the points set out below are noted.

OBJECTION – GREEN BELT DESIGNATION

3.3 The site is in a sustainable location close to several facilities including primary and secondary schools, a supermarket and a range of other services. It sits adjacent to the current urban boundary having been included within the Green Belt in 1985, long after planning permission was granted in 1972 and after the first houses of that permission were constructed.

3.4 An extract from the current proposals map is shown below at **Figure 3.1**. The Proposals Map was adopted in April 1995, establishing settlement limits and Green Belt boundaries that are now over 25 years old. The submission Policies Map is also shown at **Figure 3.1**. The site is identified on both by a red dot.

3.5 As part of the emerging Local Plan, the Council has set out exceptional circumstances for the release of land from the Green Belt for residential purposes.

3.6 Given the age of the current Proposals Map and the consequent constraints that places on development, this is hardly surprising.

3.7 What is surprising, however, is the fact that a site with an extant planning permission, bound on three sides by development and on the fourth side by a defensible boundary was not excluded from the Green Belt and included as a housing allocation.

3.8 There are many examples of sites in the emerging plan that are proposed for allocation despite having acknowledged technical challenges. None of these sites have the benefit of an extant permission.

3.9 Some of those sites are also in the Green Belt, most notably in Edenfield (site H72 (now H62 via Main Modification)), where the proposed allocation policy is the subject of multifarious caveats, which go to the heart of whether the allocation can be delivered or not.

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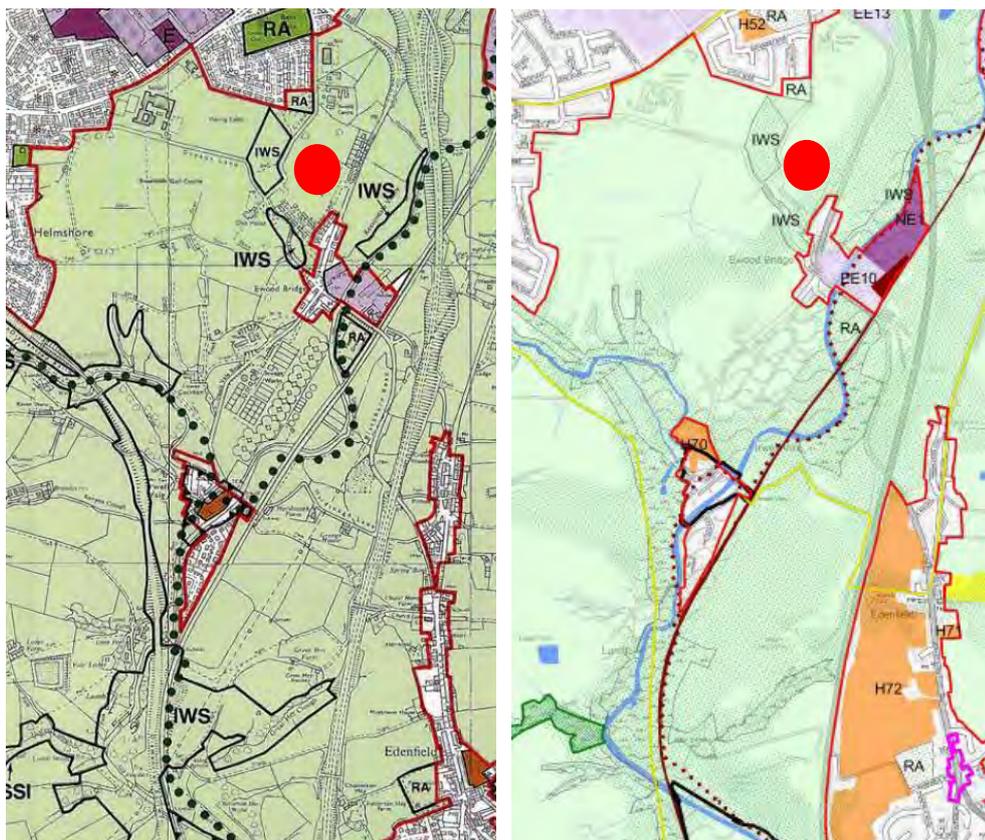


Figure 3.1 Adopted Proposals Map (left) and Submission Policies Map (right).

- 3.10 As can be seen from the above, site H72 (H62) proposes a substantial incursion into the Green Belt that has been deemed acceptable to accommodate 390 dwellings.
- 3.11 Our client's site, indicated by the red dot, would amount to a much smaller incursion, following developed and defensible boundaries.
- 3.12 According to the Council's Green Belt Review (November 2016), the site forms the southern part of a wider area of land assessed as Parcel Ref. 23.
- 3.13 The parcel is shown at **Figure 3.2** below. Note also the area outside the parcel (shown hatched), which is identified as being suitable for removal from the Green Belt, which corresponds with the 'RA' designation to the north-west of the site in **Figure 3.1** above and would form a logical connection from the urban boundary to the site.
- 3.14 The Review assesses large parcels against the five purposes now set out at paragraph 138 of the Framework.
- 3.15 With reference to the assessment carried out in the Review, our views are set out as follows.

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Figure 3.2 Parcel 23 with the site outlined in red.

PURPOSE 1

Purpose 1 - To check the unrestricted sprawl of large built-up areas

Rating:

Notes:

The parcel lies adjacent to Helmshore which is not considered to be a large built up area assessed against purpose 1. Therefore, the parcel is not considered to contribute towards checking the unrestricted sprawl of large built up areas.

Figure 3.3 Extract from Green Belt Review (November 2016) Appendix 4 – Detailed Green Belt Assessment.

3.16 We concur that the site lies adjacent to the urban boundary and that Purpose 1 does not apply.

PURPOSE 2

Purpose 2 - To prevent neighbouring towns merging into one another

Rating:

Notes:

This parcel located between the settlements of Haslingden and Rawtenstall and adjoins the urban edge of Haslingden. The settlements are within close proximity (within 1km) at this point. The parcel forms part of the settlement gap and, along with neighbouring parcels to the east, is of critical importance and plays an essential role in preventing the erosion of the visual and physical gap between the two towns. The parcel contains urban development, including large educational buildings, which have compromised the sense of openness in parts, although the area to in the south remains relatively open. Any additional development and subsequent loss of openness could lead to the perception of reducing the physical and visual gap between the two neighbouring towns.

Figure 3.4 Extract from Green Belt Review (November 2016) Appendix 4 – Detailed Green Belt Assessment.

- 3.17 The site lies within the southern part of the wider Parcel and, on any assessment, lies to the south-east of Haslingden and not between Haslingden and Rawtenstall. Having regard to the site-specific characteristics of the subject site as noted above it is our view that subject site should be classified as having a **weak** contribution to Purpose 2.
- 3.18 Whilst we acknowledge that the northern part of the parcel could be seen to function in line with Purpose 2, removal of the site from the Green Belt would extend the urban boundary southwards, not eastwards with minimal impact on the settlement gap between Haslingden and Rawtenstall. On the ground, the residential properties along Linden Park Road, Hilltop Drive and Manchester Road (B6527) function as part of the small settlement of Ewood Bridge to the south (which is excluded from the Green Belt and proposed to be extended into the Green Belt by allocation NE1) and the site is read behind the houses along these roads such that any impact on the settlement gap between towns would be scarcely credible. There would remain a significant, defensible gap between the settlements.
- 3.19 The Review contends a '**strong**' contribution by Parcel 23, defined as playing '*an essential role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would cause visual or physical coalescence or substantially reduce the gap*'. An extract from the Green Belt Review is shown below at **Figure 3.5**. The site is outlined in red. This along with the foregoing ably demonstrates that the site performs a '**weak**' contribution, playing "*a very limited role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would not be perceived as reducing the gap between settlements*"¹

¹ Definitions taken from the Rossendale Green Belt Review (November 2016), Table 2.2, Assessment Criteria for Purpose 2.

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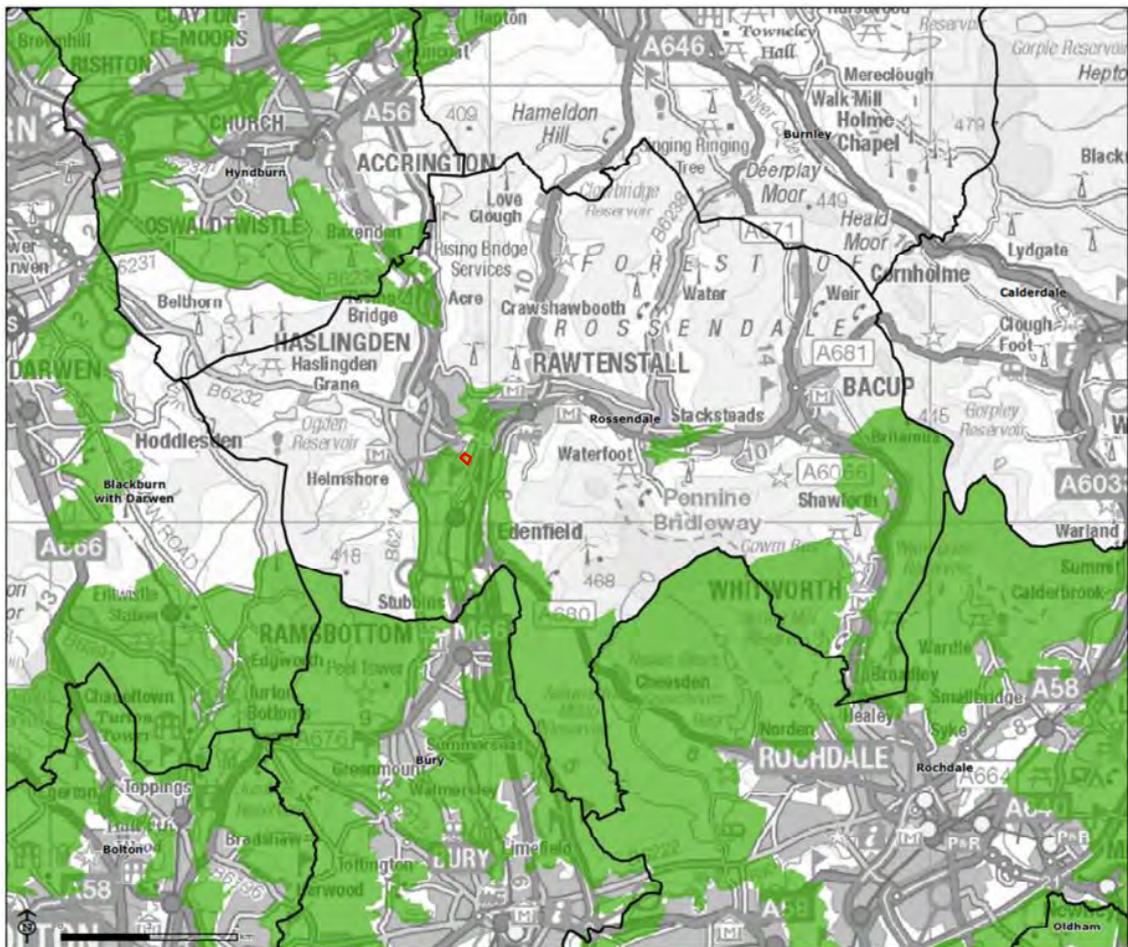


Figure 3.5 Extent of Rossendale Green Belt, Green Belt Review, November 2016.

PURPOSE 3

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Rating: Moderate

Notes:

There is a sense of encroachment within the parcel as a result of two schools and rows of houses located along Manchester Road and Hilltop Drive. Despite these urbanising influences the parcel displays some of the characteristics of the open countryside with areas of open agricultural land, semi-natural woodland and rough grassland, although it lacks a strong and intact rural character.

Figure 3.6 Extract from Green Belt Review (November 2016) Appendix 4 – Detailed Green Belt Assessment.

3.20 The Council’s own assessment acknowledges that the wider Parcel ‘contains two schools and rows of houses located along Manchester Road and Hilltop Drive’, which only serve to enclose

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our client's site. As a result, our assessment is that the site performs a '**weak**' contribution to Purpose 3, containing '*urbanising development that compromises openness*'².

PURPOSE 4

Purpose 4 - To preserve the setting and special character of historic towns

Rating: No Contribution

Notes:

Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlement areas of Cloughfold (Rawtenstall), Ramsbottom, and Rawtenstall Town Centre. In practice, this parcel has very limited intervisibility with Rawtenstall Town Centre. The openness of the land within the parcel is not considered to be important to its setting or historic significance. Therefore, any new development that took place within the parcel is considered unlikely to affect the setting or special character of the historic settlements.

Figure 3.7 Extract from Green Belt Review (November 2016) Appendix 4 – Detailed Green Belt Assessment.

3.21 We have no issue with the Green Belt Review's consideration of Purpose 4 and would agree the no contribution classification is appropriate.

PURPOSE 5

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

All parcels make an equally significant contribution to this purpose.

Figure 3.8 Extract from Green Belt Review (November 2016) Appendix 4 – Detailed Green Belt Assessment.

3.22 It is noted that Green Belt Review notes that all Green Belt land is considered to make an equal contribution to this Purpose.

OVERALL POSITION

3.23 Taking the foregoing into consideration a comparison can be made between the Green Belt Study and our own assessment:

² Definition taken from the Rossendale Green Belt Review (November 2016), Table 2.3, Assessment Criteria for Purpose 3.

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Table 1 – Comparative Assessment

Green Belt Purpose / Impact Green Belt	Green Belt Review November 2016	Hourigan Connolly October 2021
1	Not Applicable	Not Applicable
2	Strong	Weak
3	Moderate	Weak
4	No Contribution	No Contribution
5	Equal	Equal
Degree of Potential Harm to Green Belt	High ³	Low

3.24 In terms of the overall assessment in the Green Belt Review we would disagree with the overall conclusion that ‘**High**’ potential harm would materialise if the site was released for development. **Figure 3.9** below outlines the criteria for this classification to apply but, on our assessment, there would not be a ‘strong’ contribution against any Purpose. The correct classification of the site should be ‘**Low**’ in line with the following criteria:

Table 4.2 Framework for assessing harm

Stage 2 assessment of parcels	Potential harm caused by release of parcel
Makes a STRONG contribution to one or more GB purposes.	High
Makes a MODERATE contribution to one or more GB purposes. No strong contribution to any purpose.	Medium
Makes a WEAK contribution to one or more GB purposes. No strong, or moderate contribution to any purpose.	Low
Makes NO contribution to any GB purposes. No strong, relatively strong, moderate, relatively weak or weak contribution to any purpose.	None

Figure 3.9 Extract from Green Belt Review, November 2016.

3.25 In this case, release of the subject site would constitute no sprawl, none to very limited impact on towns merging (because it would cause no narrowing of a gap between towns, instead extend southwards away from that gap), no encroachment into the countryside due to the enclosed nature of the site and no impact on preserving the setting of a historic settlement. Moreover, it would constitute a scarcely credible weakening of wider Green Belt land.

³ Based upon para. 4.2 of Green Belt Review, November 2016.

OBJECTION - DEVELOPABILITY

- 3.26 The Inspectors are concerned that, based upon the evidence before them at the time of writing their letter to the Council on 30th June 2021, there is not sufficient certainty to conclude that the site will come forward for development by 2035/36; that is to say that the Inspectors are concerned that the site is not developable.
- 3.27 The Glossary of the 2021 Framework sets out the definition of developable in relation to housing in planning terms:
- 'Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'*
- 3.28 It is acknowledged that the site presents significant technical challenges. However, our client is now under contract to bring the site forward for development.
- 3.29 Miller Homes Northwest have considerable expertise in delivering complex sites for residential development. The latest example of such success is Novus, an award-winning development in Stretford. This former Gas meter factory had complex contamination and geotechnical issues, from gross asbestos contamination and chlorinated solvents in the shallow groundwaters, through to soils with poor geotechnical properties that required significant stabilisation. Owing to Miller's technical expertise, 282 homes have been created on this site in a mixture of apartments, of up to six storeys in height, and houses, all of which are architecturally bespoke.
- 3.30 Following detailed analysis of the technical evidence available to them, that has been submitted to the Inspectors and the Council by others prior to and following the Examination of the Local Plan, our clients believe the extant permission (Ref.: 13/2/2758) on site to be capable of being built out in principle.
- 3.31 On this basis, taking into account the Opinion of Leading Counsel also submitted previously, it is our firm contention that a fall-back position does exist on site.
- 3.32 However, it is accepted that the extant approved scheme (included at **Appendix 1**) is no longer likely to meet modern housing requirements. Accordingly, an alternative, indicative site layout plan, included at **Appendix 2**, has been prepared to demonstrate that a less dense, modern scheme of around 138 houses, comprising a range of house types, could be delivered at the site.
- 3.33 Our client would develop the site out within the Plan period.
- 3.34 Our client's involvement represents a significant change in circumstances regarding the site and represents new evidence that the subject site is a site that could be brought forward within the Plan period.

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- 3.35 We would respectfully request that the Inspectors and the Council take note of this new position in accordance with paragraph 31 of the Framework, which requires that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence.
- 3.36 The Council has accepted the association of other sites in the Plan with housebuilder as being suitable evidence that the site can be considered developable and we would simply ask that our client is afforded the same view. Similarly, other proposed allocations are being taken forward and considered developable on the basis of far less up-front technical information than has been submitted in support of the site.
- 3.37 We simply ask that the site be treated fairly and in the same manner as others have been.

OBJECTION - DELIVERABILITY

- 3.38 The Glossary of the 2021 Framework sets out the definition of deliverable in relation to housing in planning terms:

“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.

- 3.39 The site benefits from an extant planning permission and, following a review of the technical assessments submitted in support of the site, our client considers part of the site to be deliverable.
- 3.40 We have included at **Appendix 3** an extract from the Preliminary Land Stability Assessment Report submitted by others. The extract comprises the zoning plan.

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- 3.41 Having regard to 'Zone A', our client considers that that part of the site is suitable for development now.
- 3.42 It is our client's intention to commence the pre-application process prior to the end of 2021 with a view to working with the Council and submitting a planning application for a scheme of around 50 new homes as illustrated in the layout provided at **Appendix 4**. The scheme would be delivered within years 1 to 5 of the Local Plan.

AVAILABILITY

- 3.43 The subject site is in simple freehold ownership.
- 3.44 There are no tenancies, including agricultural holding tenancies.
- 3.45 There are no covenants or other restrictions affecting the land that would preclude or delay residential development.
- 3.46 The land is clearly available for development and the Council could expect the submission of a full planning application within 6 to 9 months.
- 3.47 Given potential capacity of the 'Zone A' site, this is a site that could be expected to be complete within 3 years of development commencing and hence it is a site that should be placed in the first 5 years of the housing trajectory.

SUITABILITY

- 3.48 The site has the benefit of an extant permission. As noted above, the reasons for including the site within the Green Belt and removing it from the Council's housing supply figures are not accepted.

ACHIEVABILITY

- 3.49 Insofar as a residential proposal for 'Zone A' is concerned, the technical evidence submitted to the local Plan indicates that the subject site is unlikely to be affected by land slip and can be developed.
- 3.50 Access for a residential development is readily available as are utilities.
- 3.51 Surface water can be adequately dealt with.
- 3.52 Clearly the site is available for development and could be completed in full well within 5 years (with the balance within the Plan period).

4. SOUNDNESS ASSESSMENT

GREEN BELT

- 4.1 The failure of Local Plan to remove the site from the Green Belt to meet future housing needs is unsound for the following reasons:

JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY

- 4.2 The approach of Local Plan is inconsistent with Paragraph 35 of the Framework. The inclusion of the site within the Green Belt is not justified in view of the fact that the site performs poorly when assessed against the five purposes for including land within the Green Belt. Exceptional circumstances have been demonstrated by the Council to justify removal of land from the Green Belt to meet development needs and, particularly in the context of the site benefitting from an extant permission, the continued designation of the site as Green Belt is neither justified nor consistent with national policy.

AMENDMENTS SOUGHT

- 4.3 The following amendments are sought:
- That the site be removed from the Green Belt and allocated for residential development.
 - In the event that our submission seeking removal of our client's site from the Green Belt is unsuccessful then the site should be included within the Council's housing land supply figures. Around 130 houses are considered to be developable within the Plan period.

DEVELOPABLE WITHIN THE PLAN PERIOD

- 4.4 The failure of Local Plan to include the site within the developable supply is unsound for the following reasons:

JUSTIFIED

- 4.5 The site benefits from an extant permission. At the time of their request that the Council remove the site from the housing supply, the Inspectors could not be aware of our client's involvement. That Miller Homes is now under contract to bring the site forward for development represents a

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significant change in circumstances. Our client is of the view that the extant permission is capable of being delivered in principle but that it is no longer appropriate for modern requirements. In accordance with Counsel's Opinion, a fall-back exists. Based upon their significant experience, our client is of the view that a scheme of around 130 homes could be developed within the plan period.

4.6 Based upon this new evidence, removal of the site from the supply is not justified.

AMENDMENTS SOUGHT

4.7 The following amendments are sought:

- That the site be included in the Council's developable housing supply. Around 130 houses are considered to be developable within the Plan period.
- In the event that our submission seeking the inclusion of the site in the Council's housing land supply figures for around 130 houses is unsuccessful then the site should be included within the Council's deliverable housing land supply figures. Around 50 houses are considered to be deliverable within years 1 to 5.

DELIVERABLE

4.8 The failure of Local Plan to include the site within the deliverable supply is unsound for the following reasons:

JUSTIFIED

4.9 At the time of their request that the Council remove the site from the housing supply, the Inspectors could not be aware of our client's involvement. Our client has carefully considered the technical evidence available to them and based upon their significant experience of delivering homes on similarly technically challenging sites, they are of the view that a fall-back exists and that a scheme of around 50 homes can be delivered on site within years 1 to 5.

4.10 The proposal to remove the site from the Council's housing supply figures is unreasonable and not based upon up to date evidence.

AMENDMENTS SOUGHT

4.11 The following amendments are sought:

- That the site be included in the Council's deliverable housing supply. Around 50 houses are considered to be deliverable.

Appendix 1

RECEIVED
MAY 11 1952

BOIT CLUB HOUSE

future planning submission

proposed change to layout

proposed change to layout
1/24" 0/16" 0/12" 0/8" 0/6" 0/4" 0/3" 0/2" 0/1" 0/1/2" 0/1/4" 0/1/8" 0/1/16" 0/1/32" 0/1/64" 0/1/128" 0/1/256" 0/1/512" 0/1/1024" 0/1/2048" 0/1/4096" 0/1/8192" 0/1/16384" 0/1/32768" 0/1/65536" 0/1/131072" 0/1/262144" 0/1/524288" 0/1/1048576" 0/1/2097152" 0/1/4194304" 0/1/8388608" 0/1/16777216" 0/1/33554432" 0/1/67108864" 0/1/134217728" 0/1/268435456" 0/1/536870912" 0/1/1073741824" 0/1/2147483648" 0/1/4294967296" 0/1/8589934592" 0/1/17179869184" 0/1/34359738368" 0/1/68719476736" 0/1/137438953472" 0/1/274877906944" 0/1/549755813888" 0/1/1099511627776" 0/1/2199023255552" 0/1/4398046511104" 0/1/8796093022208" 0/1/17592186044416" 0/1/35184372088832" 0/1/70368744177664" 0/1/140737488355328" 0/1/281474976710656" 0/1/562949953421312" 0/1/1125899906842624" 0/1/2251799813685248" 0/1/4503599627370496" 0/1/9007199254740992" 0/1/18014398509481984" 0/1/36028797018963968" 0/1/72057594037927936" 0/1/144115188075855872" 0/1/288230376151711744" 0/1/576460752303423488" 0/1/1152921504606846976" 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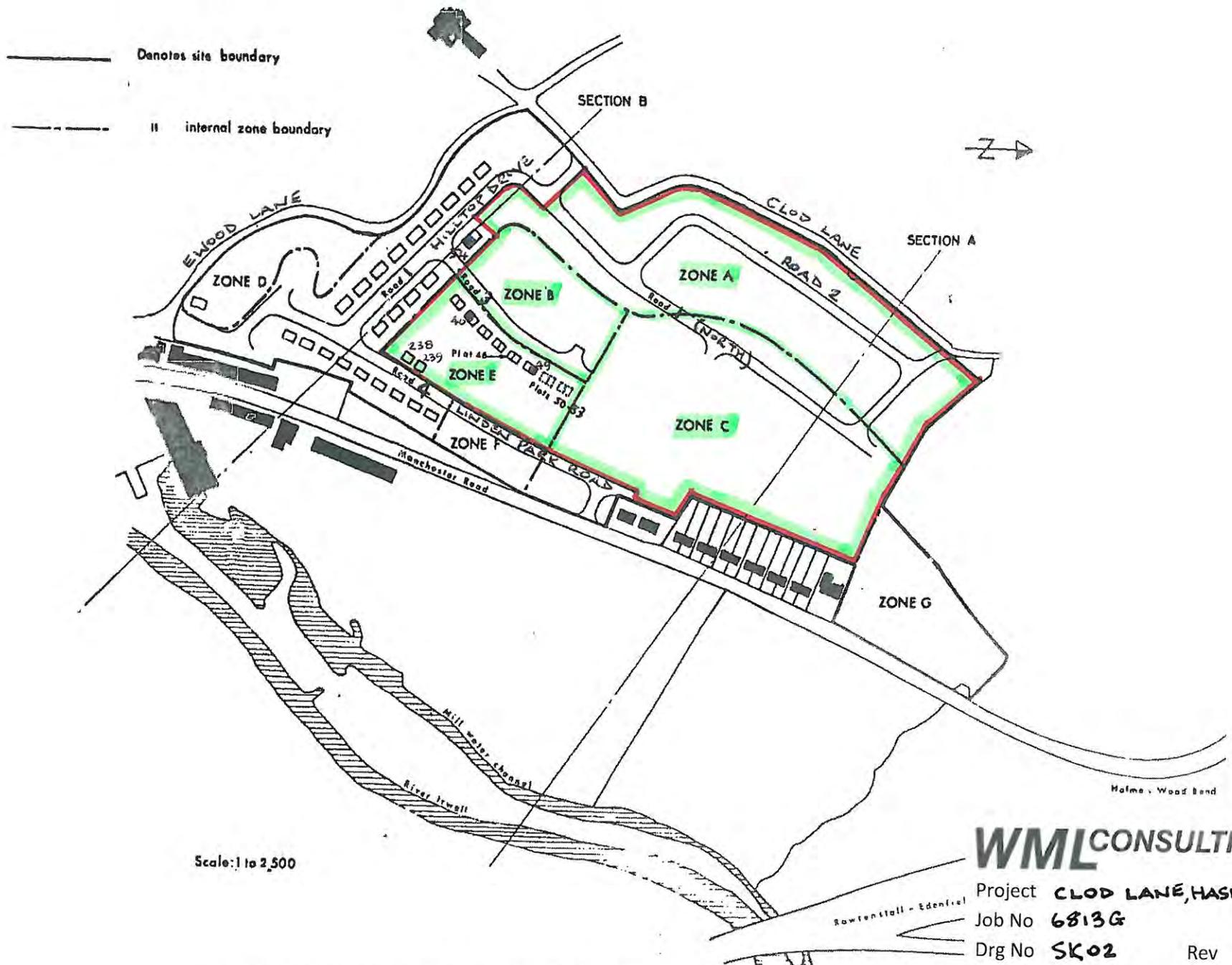
Appendix 2



Accommodation Schedule		
24 No.	302C Overton @ 76sqm	17%
18 No.	304N Masterton @ 77sqm	13%
12 No.	309T Eaton @ 94sqm	9%
12 No.	310T Parkton @ 96sqm	9%
14 No.	403N Beechwood @ 93sqm	10%
18 No.	405N Elderwood @ 97sqm	13%
8 No.	406C Blackwood @ 101sqm	6%
22 No.	407N Hazelwood @ 107sqm	16%
10 No.	412M Inglewood @ 121sqm	7%
138 No.	Total Units	100%
334 No.	Parking Spaces	242%
6.3 Ha	Site Area	
22 No.	Dwellings per hectare	



Appendix 3



ZONING OF SITE FOR DEVELOPMENT (AFTER 1978 REPORT - FIG.18)

WMLCONSULTING

Project **CLOD LANE, HASLINGDEN**
 Job No **6813G**
 Drg No **SK02** Rev
 Scale **1:2,500**
 Date **2nd DECEMBER 2015**

FIG.7

Appendix 4



Accommodation Schedule		
6 No.	302C Overton @ 76sqm	12%
6 No.	304N Masterton @ 77sqm	12%
8 No.	309T Eaton @ 94sqm	16%
5 No.	310T Parkton @ 96sqm	10%
4 No.	403N Becwood @ 93sqm	8%
5 No.	405N Elderwood @ 97sqm	10%
2 No.	406C Blackwood @ 101sqm	4%
8 No.	407N Hazelwood @ 107sqm	16%
7 No.	412M Inglewood @ 121sqm	14%
51 No.	Total Units	100%
128 No.	Parking Spaces	251%
2.26 Ha	Site Area (Zone A only)	
23 No.	Dwellings per hectare	

--- Approximate lines of zoning plan



ROSSENDALE LOCAL PLAN 2019 – 2034**CONSULTATION ON SCHEDULE OF PROPOSED MAIN MODIFICATIONS
(SEPTEMBER 2021)****CONSULTATION DEADLINE: 15 OCTOBER 2021****RESPONDENT: MR N. TEAGUE (RESPONDENT REF. 51921)****REPRESENTATION: LAND AT ELM STREET, EDENFIELD****COMMENTS ON: POLICIES MAP MODIFICATIONS – MODIFICATION
REQUIRED**

INTRODUCTION

1.1 Rossendale Borough Council has issued its Schedule of Proposed Main Modifications for comment. The consultation will end on Friday 15th October 2021. The key documents subject to the current consultation are:

- i) Schedule of Proposed Main Modifications to the Publication (Regulation 19) Draft Plan (September 2021).
- ii) An accompanying schedule details minor Additional Modifications which include factual updates, corrections and formatting changes.
- iii) A schedule of changes to the Policies Map (August 2021).

1.2 We confirm that the Council has not made any contact with the Respondent Mr N. Teague to discuss the subject site since the close of the Hearings in October 2019.

POLICIES MAP MODIFICATIONS – MODIFICATION REQUIRED

1.3 As submitted in our previous Representations, the Policies Map should be amended to include additional land within the Urban Boundary and remove land from the Green Belt.

¹ Respondent Reference Number as per Hearings held in September & October 2019

- 1.4 The Inspectors are fully aware of our successive representations and Hearing Statement, so it is not necessary to repeat those here in full for brevity's sake.
- 1.5 The Inspectors will recall that we asked them to consider the potential for further land at Elm Street in our client's ownership to be released from the Green Belt (in addition to that which was put forward to the Submission Plan) which has become available since the closure of the Hearings. This was outlined in our representations dated 01 December 2020 to the Council's Consultation on Examination Library 8.
- 1.6 For clarity and to assist the Inspectors, Map 24 of document EL8.008.1 indicates the extent of the subject site's boundaries as submitted at the Regulation 18 and 19 consultation stages and in our Hearing Statement as shown below at **Figure 1.1**. This area of land extends to 0.6Ha and is capable of delivering in the region of 10no. dwellings.



Figure 1.1 Site as Submitted at Reg. 18 and 19

- 1.7 The larger area of land also available and presented to the Consultation on Examination Library 8 is shown below at **Figure 1.2**. This area extends to 2.0Ha and is capable of delivering in the region of 40 to 50 homes.



Figure 1.2 Larger Site as Submitted to Consultation on EL8

- 1.8 National planning policy (Paragraph 140 of the revised Framework, 20 July 2021) states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.
- 1.9 The Council has established exceptional circumstances for the release of land from the Green Belt across the Borough in order to deliver the Council's identified housing requirements over the Plan period. The emerging Local Plan includes numerous amendments to the Green Belt and Urban Boundaries.
- 1.10 Edenfield is a sustainable location for residential development, of that there is no doubt. Our client's land lies within walking distance of a range of services and facilities.
- 1.11 The Council has repeatedly demonstrated that they have not considered the merits of our client's land as a smaller part of the wider Parcel 47 (as identified in the Green Belt Review, 2016), and they continue to overestimate the value of the Green Belt in the particular location of our client's land.
- 1.12 The subject site has not been assessed of itself by the Council against the well-established Purposes for including land within the Green Belt, most recently enshrined in Paragraph 138 of the Framework.
- 1.13 With reference to our previous submissions and in line with the Council's methodology in the assessment carried out in their Green Belt Review (2016), the Inspectors are reminded that we have carried out such an exercise, set out in successive representations to the Plan, which concludes that the contribution our client's land makes to the Purposes set out at Para. 138 of the Framework is **weak**.
- 1.14 We consider our assessment to apply equally to both parcels identified at **Figures 1.1 and 1.2** above. In both cases, suitable mitigation could be included as part of any development proposal to round off the settlement and present a more identifiable, defensible boundary to the Green Belt than currently exists. The current boundary is formed by the rear gardens of properties that front Rochdale Road, all of which appear to have encroached into the Green Belt over time.
- 1.15 As a result, and in order to provide for sustainable development over the plan period, the land should be included within the urban boundary of Edenfield and subsequently it should be removed from the Green Belt.

DELIVERY

- 1.16 The Council has previously raised a comment regarding site access. In order that the most up to date evidence is considered, we would wish to make the Inspectors aware that the site is now the subject of positive feedback on highways matters from Lancashire County Council (enclosed at **Appendix 1**).

- 1.17 Similarly, the Inspectors should also be aware that the smaller parcel of land shown at **Figure 1.1** is now also the subject of an application for Permission in Principle for up to 9no. dwellings, submitted to the Council as of today's date.

CONCLUSION

- 1.18 The failure of Local Plan to remove the site from the Green Belt to meet future housing needs is unsound for the following reasons (with reference to para. 35 of the Framework):

JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY

- 1.19 The approach of Local Plan is inconsistent with Paragraph 35 of the Framework. The inclusion of the land within the Green Belt is not justified in view of the fact that it performs poorly when assessed against the five purposes for including land within the Green Belt. Exceptional circumstances have been demonstrated by the Council to justify removal of land from the Green Belt to meet development needs and the continued designation of the site as Green Belt is neither justified nor consistent with national policy.

AMENDMENTS SOUGHT

- 1.20 The following amendments are sought:
- a) That the land as outlined at **Figure 1.2** be removed from the Green Belt, included within the Urban Boundary and allocated for residential development.
 - b) In the event that our submission at **a)** above is unsuccessful, then the site shown at **Figure 1.1** should be removed from the Green Belt, included within the Urban Boundary and allocated for residential development.

Appendix 1

duncancarter@axisped.co.uk

Phone: 0300 123 6780

Email: highways@lancashire.gov.uk

Your ref: PRE-APP

Our ref:

Date: 23rd September 2021

**Pre-Planning application advice
Land at Elm Street, Edenfield
Outline - Erection of 15 dwellings**

The following comments are made in response to the Axis scoping note and potential road alignment option 3 drawing reference 2794-01-SK03B.

The following comments will cover access, there is no layout submitted with this application.

Rochdale Road junction Elm Street

Elm Street is an unadopted road which joins Rochdale Road A680 approx. 80m south of the mini roundabout junction with Bury Road/Market Street.

The A680 forms a strategic cross country district route between East Lancashire and the wider Rochdale area. We have count data from 2015, on Rochdale Road immediately north of Elm Street, which shows average daily flows of 8000 vehicles with around 9% HGV traffic. The 85thile speed data shows NB 26mph SB 31mph There is a large quarry on Scout Moor which accounts for the higher than average HGV movements.

Speed data has been collected on week commencing 27th February 2020 with 85thile speeds SE bound 29.4mph and 30.04mph NW bound. The data was collected during lockdown however the data we have on our system confirms that the speed data collected is comparable.

The existing visibility splays at the Rochdale Road junction Elm Street are below standard and a scheme is proposed to advance the give way marking and widen the footways on Rochdale Road to achieve splays of X2.4m by 40m in both directions along the nearside kerb of Rochdale Road, off-set by 1m.

This reduces the carriageway width from 7m to 6.10m. We would not support a reduction in width to less than 6.5m and this width would need to be supported with vehicle swept path analysis to show that 2 HGV's can pass due to the curve in Rochdale Road.

Phil Barrett

Director of Community Services

Cuerden Way • Bamber Bridge • Preston • PR5 6BS

A swept path for a refuse vehicle to negotiate the junction of Elm Street and Rochdale should also be provided.

There is an element of on-street car parking on Rochdale Road in the vicinity of Elm Street due to the lack of off-street parking at the nearest dwellings. The impact of this needs to be considered.

Sustainability

The mainline bus service bus stops are located on Bury Road within close walking distance. The services are X41 (Accrington-Manchester), 481 (Burnley-Bury) and 483 (Burnley-Bury). The nearest bus stops require bus border kerbing upgrade to provide DDA compliance.

There are some facilities nearby in Edenfield Centre and the nearest primary school is within walking distance.

Overall the site provides options to travel sustainably, by walking, cycling and bus travel. On site facilities including electric vehicle charging and secure cycle parking will further support this.

Elm Street

Elm Street itself is unmade and without a piped surface water drainage system or system of street lighting. It is privately maintained.

Elm Street would need to be brought up to adoptable standard. I note that the drawing shows that Elm Street is within the ownership of the applicant which will enable this work to be undertaken and dedicated under S38 of the highways act.

The proposed footway and carriageway widths shown on the drawing are acceptable.

Internal Layout

There is no layout provided at this stage however we would seek a layout which conforms with Manual for Streets and prioritises walking, cycling and provides suitable infrastructure to enable large service vehicles to enter and leave Elm Street in forward gear.

Parking

The vehicle parking should be provided in accordance with the Rossendale BC parking standards, e.g. 2/3 bedrooms = 2 spaces and 4+ bedrooms = 3 spaces.

Garages should have internal dimensions of 3m x 6m to count as a parking space.

Each dwelling should have a secure, covered cycle store and electric vehicle charging point with 7kw output and universal socket that can charge all types of electric vehicles.

Advice

1. Amend scheme to provide 6.5m carriageway and provide swept path analysis for HGV's to pass on Rochdale Road on the curve at the Elm Street junction.
2. Consider collecting further speed data under regular flow conditions.

3. Collect data on on-street car parking on Rochdale Road

Yours faithfully

Kelly Holt
Highways Development Control
Lancashire County Council

ROSSENDALE LOCAL PLAN 2019 – 2034

CONSULTATION ON SCHEDULE OF PROPOSED MAIN MODIFICATIONS
(SEPTEMBER 2021)

CONSULTATION DEADLINE: 15 OCTOBER 2021

RESPONDENT: B&E BOYS LTD (**RESPONDENT REF. 5192¹**)REPRESENTATION: HASLINGDEN CRICKET CLUB**COMMENTS ON: MM008: POLICY H46 – DO NOT SUPPORT
MODIFICATION.****POLICIES MAP MODIFICATIONS – MODIFICATION
REQUIRED.**

APPENDICIES**Appendix A Letter and enclosures to Council dated 12 August 2021****INTRODUCTION**

1.1 Rossendale Borough Council has issued its Schedule of Proposed Main Modifications for comment. The consultation will end on Friday 15th October 2021. The key documents subject to the current consultation are:

- i) Schedule of Proposed Main Modifications to the Publication (Regulation 19) Draft Plan (September 2021).
- ii) An accompanying schedule details minor Additional Modifications which include factual updates, corrections and formatting changes.
- iii) A schedule of changes to the Policies Map (August 2021).

¹ Respondent Reference Number as per Hearings held in September & October 2019

BACKGROUND CONTEXT – PREVIOUS DISCUSSIONS WITH THE COUNCIL

- 1.2 Hourigan Connolly has submitted Representations in respect of the subject site to previous stages of the Local Plan. Since our most recent Representation (to the Technical Consultation – Housing and Employment Updates in June 2021) we have engaged constructively with the Council and most recently wrote to them on 12 August 2021. This letter, and its enclosures were copied to the Inspector c/o the Programme Officer and trust these were received at the time, however they are contained in **Appendix 1** for convenience.
- 1.3 For context, Action 11.3 of the Schedule of Actions (EL6.001) was issued after the Hearings in 2019 and required the Council to undertake the following:
- “Produce a draft specific policy, in consultation with landowner/developer and Sport England, including: reason for needing a mixed use allocation, proposed enhancements to the existing sports facilities and how this relates to the housing development (if found acceptable, amend Policies Map to show a larger mixed use allocation) – Inspector to confirm view on whether this is acceptable.”*
- 1.4 Back in June 2021 we confirmed to the Local Plan process that a very positive meeting had been held at the end of May 2021 between the Council, Sport England, the ECB, and ourselves along with Haslingden Cricket Club and their chosen development partner B&E Boys Ltd. The conclusion from that meeting was that all parties would be agreeable to a new mixed-use policy being included in the Local Plan, to replace site H52 (as it was then drafted), which relates specifically to the delivery of 30 dwellings in conjunction with the retention and improvement of the existing sports facilities at Haslingden Cricket Club. Hourigan Connolly prepared some draft wording for that site-specific policy and that was agreed with both Sport England and the ECB. The policy was submitted to the Council and discussions followed suit. The conclusions of those discussions, as understood by Hourigan Connolly, were set out in our letter dated 12 August 2021 (Appendix 1). For the avoidance of doubt, the Council did not dispute the contents of that letter, nor have they approached Hourigan Connolly since to have any further discussions about the proposed allocation of Haslingden Cricket Club.
- 1.5 Our Representation to this current consultation focuses on the fact that the Council continues to include the site as a housing allocation rather than a Mixed-Use allocation. It is not clear to us why the Council no longer agree that a Mixed-Use policy could deliver the redevelopment of Haslingden Cricket Club, after we were under the impression, following our discussions in August 2021, they were in agreement that a Mixed-Use policy was a suitable way forward. The first we knew that this was not the Council’s preferred way forward was upon publication of the Main Modifications consultation.
- 1.6 Our position remains that the subject site at Haslingden Cricket Club should be allocated as a **Mixed-Use** policy for the reasons previously submitted and reiterated herein.

MM008: POLICY H46 – DO NOT SUPPORT MODIFICATION

- 1.7 The Table 7 contained at MM008 of the Schedule of Proposed Main Modifications sets out the Housing Site Allocations. The numbering of the proposed allocations has been changed, with the subject site at Haslingden Cricket Club now being allocated as H46 (previously known as H52):

H52 H46	Land to the rear of Haslingden Cricket Club	0.74	30	41	Years 1-5	Greenfield	Housing	HS2	Yes
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- 1.8 We confirm our agreement to the principle of allocation, and we are also agreement with the components of the content of the proposed allocation in so far as the developable area is correct, the proposed number of dwellings is correct as is the potential density, and we also agree that the housing could be delivered within years 1 to 5 of the Plan period.
- 1.9 Our objection to the Main Modifications in respect of Site Allocation H46 relates to the principle of allocating the site solely for housing, whereas our position remains clear that the site should be allocated as a Mixed-Use policy in order to properly deliver the housing and sports facilities as a holistic approach.

HASLINGDEN CRICKET CLUB – MIXED-USE POLICY INSTEAD OF HOUSING POLICY

- 1.10 The site is suitable in principle for housing development and the estimated yield of 30 dwellings is entirely achievable. However, there are specific constraints relevant to the site which must be addressed in order that houses can be delivered, and we continue to recommend that the Local Plan be revised to include a specific and unique policy which enables a mixed-use development at the Club. Housing on this site, in the location proposed, is not possible in isolation and is only deliverable in the relevant timeframes as part of a wider mixed-use scheme and the two elements should be viewed as being as important as each other.
- 1.11 B&E Boys Ltd are a successful Rossendale-based family company which is keen to invest in Haslingden Cricket Club to not only help the Club to secure its cricketing future, but to significantly improve the playing facilities for young people to engage in the sport of cricket. This is something to be applauded and encouraged. However, B&E Boys Ltd is not a charity and will not embark on any redevelopment proposals unless there is a commercial benefit to be made. B&E Boys Ltd is committed to bring forward the allocated housing site alongside the necessary improvements to the Club's ground at Private Lane. However, any improvements, or replacement facilities for the benefit of the Club will never be realised unless and until the necessary revenue is generated by the construction and sale of the allocated housing. From a commercial delivery point of view, no developer or housebuilder will be able to bring forward the housing allocation either in isolation or post-delivery of a new cricket pavilion or replacement pitch facilities.

- 1.12 The only way the new homes can be brought forward is through a comprehensive approach to the redevelopment of the whole site to provide new, improved cricket facilities on-site in the form of a new, re-located cricket pavilion for the benefit of the Club and a replacement practice cricket strip.
- 1.13 With the above in mind, we request that the allocation of land at Haslingden Cricket Club for 30 no. houses and the improvements to the Cricket Club be dealt with in the Local Plan under a site-specific Mixed-Use allocation Policy, and not a housing allocation policy.

MIXED-USE POLICY – DRAFT WORDING

- 1.14 Page 58 of the Council's Schedule of Main Modifications (September 2021) sets out the Council's proposed draft wording of Policy H46. It is noted that the Council's draft wording has largely been taken from the tracked changes document attached to Hourigan Connolly's letter dated 12 August 2021 (Appendix 1).
- 1.15 We are in agreement with the wording proposed by the Council; indeed we were heavily involved in the discussions which led to this wording. Our concerns simply lie with the fact that the Council are choosing to allocate the land under housing, rather than the more appropriate Mixed-Use approach.

CONCLUSION

- 1.16 Any proposal for new housing on the subject site will be intrinsically linked to the costs associated with the delivery of the improvements to Haslingden Cricket Club's sports facilities. The financial viability and associated costs with delivering those improvements should be regarded as abnormal costs, and full account will therefore need to be taken of these when the Council is considering the details of any scheme for the new housing. Revenue generated by the construction and sale of the housing will be used to deliver the improvements to the sports facilities, which will bring about significant benefits for the local community and wider Borough.
- 1.17 On behalf of our client we have consistently made the Council aware that viability will play a role in the delivery of the draft allocation given the intrinsic link between the housing and the cricket club.
- 1.18 This is why we remain confident, with the agreement of Sport England and the ECB, that a site-specific Mixed-Use policy will not only deliver the housing which forms part of the Council's housing delivery strategy, but will also result in the safeguarding, and much-required improvement of, the existing sports facilities.

POLICIES MAP MODIFICATIONS – MODIFICATION REQUIRED

- 1.19 Given that our submissions take the position that the site should be allocated for Mixed-Use and not simply Housing, the Policies Map should be amended to reflect the appropriate 'colouring', that being 'pink' and not 'orange'.

CONCLUSIONS

- 1.20 Hourigan Connolly reserves the right to submit comments at the second tranche consultation stage to not only supplement Representations contained in this Statement, but also in addition to all other Representations submitted at previous stages of the emerging Local Plan in relation to the subject site.

Appendix 1

Your Ref :
Our Ref : 2021-08-12 LPA
Date : 12 August 2021

WeWork
1 St. Peter's Square
Manchester M2 3DE

e - info@houriganconnolly.com
w - www.houriganconnolly.com
t - 0333 939 8057

Anne Stora
Principal Planner (Forward Planning)
Rossendale Borough Council
Futures Park
Bacup
Rossendale
OL13 0BB

BY EMAIL ONLY: annestorah@rossendalebc.gov.uk

Dear Anne,

**ROSSENDALE LOCAL PLAN 2019 – 2034
HASLINGDEN CRICKET CLUB – DRAFT MIXED USE POLICY**

I apologise for the delay in responding to the Council's comments (received on 01 July 2021), on the draft Mixed-Use Policy for Haslingden Cricket Club. I enclose the tracked changed document for convenience, noting that [FP] refers to Fiona Pudge from Sport England and that [AS] and [SG] refers to yourself and Storm Grimshaw as the Council's Planning Policy Officers.

Please note, I have copied this letter to the Programme Officer so that they can forward this letter and the enclosures to the Rossendale Local Plan Inspectors, primarily so that they are made fully aware that we are liaising with the Council to reach an agreed position in terms of the Mixed-Use Policy for Haslingden Cricket Club. We feel it is important and beneficial to all parties concerned, that the Inspectors are fully apprised of the progress being made in advance of the anticipated Main Modifications consultation. I have also copied in Fiona Pudge and Suzanne Redfern MBE (England and Wales Cricket Board) given that they have also kindly contributed to the progress made so far on this draft Policy.

For the benefit of the Inspectors, I have also included a copy of our most recent Representation to the Local Plan process, an email dated 16 June 2021 relating to the recent Technical Consultation - Housing and Employment Updates.

I have discussed the Council's comments with my client and Haslingden Cricket Club, and we would like to place on record the following:

- i. It is our firm view that we should be agreeing the detail of the Mixed-Use policy now and not leaving it for later - the work done now will surely assist the Council's preparation of the Main Modifications consultation? If this text needs to be agreed at some point, why not now (as the Inspectors requested it happened), rather than anticipating potential further changes as a result of the Main Modifications.
- ii. The policy, once adopted, will form part of the development plan and will therefore be used for development management purposes. With this in mind, we do not agree with the Council comment [AS7] that the proposed Parameters Plan should be more

detailed than that already suggested. There is no requirement for the policy to be so prescriptive on the layout, especially when there has been no detailed and costed design completed at this early stage.

The key player in ours and my client's mind is Sports England, and Ms Pudge has already shown she is happy to agree to an identified area of land which should be retained for the sports provision, i.e., the Parameters Plan as already drafted. Additional, specific details can be secured with the Council through the submission of a masterplan as part of a planning application (i.e., part (b) of the Policy) and the development management process once a planning application is submitted for determination.

- iii. In [AS7] comment the Council recalls seeing a more detailed plan previously, and that is correct, a draft illustrative masterplan layout was submitted within our Hearings Statement. This plan was supported by a Technical Highways Note for information / illustrative purposes, but the plan provided no details on the proposed housing simply because these details have not been fully investigated yet.

It is helpful to note that ourselves and the Council have now reached an agreement that a Mixed-Use policy is the most suitable mechanism to deliver both the sports facilities and housing development at the subject site. However, the details of one cannot be considered without the details of the other and the two uses would be equal elements in the Mixed-Use Policy. To request that a more detailed parameters plan should accompany the Policy text at this stage would require further technical input now, including from the ECB. Until such time that design parameters, siting of the new homes, specifics of the pavilion etc. and costings can be discussed and agreed, we believe it would be premature to expect those details to form part of the policy wording. The approval of such detailed matters would be better dealt with through the development management process, in line with an approved masterplan (as we have suggested).

- iv. The Inspectors have not indicated in their Post Hearing Letter (30 June 2021) that they are aware we have been discussing matters with the Council and Sport England – their section on 'Site-specific policies for mixed-use allocations' makes no mention of Haslingden Cricket Club and gives no indication that they anticipate the proposed new mixed-use policy is being drafted. In our view it is imperative the Inspectors are alerted to this now, and not later at the Main Modifications stage; this is another reason to agree the policy wording now and not later.
- v. Finally, I would like to respond to your comment '*I reiterate that this will form part of the Main Mods consultation and obviously ultimately it is the Inspectors who'll decide*' in your email on 01 July 2021. Yes, we agree that the Inspectors have the final decision on the drafting of the policy, however we really believe it would be more efficient if the draft Policy text be agreed now in advance of the Main Modifications to reduce the potential for future revisions to the text. This policy forms part of the Council's housing delivery strategy and will simultaneously secure the future provision of community sports in the local area, therefore on behalf of my client and Haslingden Cricket Club, we are really motivated to reach an agreement to the policy as soon as possible.

In addition, at the Examination, the Inspector specifically requested that the Council work with my client and the HCC to present them with an agreed policy for the site.

With the above comments in mind, I would request that the Council reconsiders its submission that the policy should contain a detailed list of requirements or a more detailed layout, and understand that by including the need for the submission and approval of a masterplan as part of the Policy text (i.e. criteria (b)), this would provide the Council with the comfort that the proposed policy as currently drafted will deliver its strategic objectives.

I look forward to hearing your thoughts on this once you have considered these contents; please do not hesitate to contact myself and Daniel should you wish to discuss things further.

I would also be grateful if you could advise when the Council anticipates commencing the Main Modifications consultation, so I can update my client accordingly.

Kind regards

Yours sincerely



**BEVERLEY MOSS BA (Hons) MA MRTPI
Associate**

cc: Daniel Connolly Hourigan Connolly
B&E Boys Ltd and Haslingden Cricket Club
Alison Barnes } Rossendale Borough Council
Cath Burns
Anne Storah
Storm Grimshaw
Fiona Pudge Sport England
Suzanne Redfern MBE England and Wales Cricket Board
Tony Blackburn Programme Officer for Rossendale Local Plan Examination

Encl. Various enclosures for information purposes

Beverley Moss

From: Beverley Moss
Sent: 16 June 2021 14:35
To: Forward Planning
Cc: Daniel Connolly
Subject: Technical Consultation - Housing and Employment Updates: Response in relation to Land to the Rear of Haslingden Cricket Club: H52

**HOURIGAN CONNOLLY RESPONSE ON BEHALF OF:
RESPONDENT REFERENCE: 5195 – HASLINGDEN CRICKET CLUB AND B&E BOYS LTD**

Dear Forward Planning.

Thank you for notification of the above consultation.

I write on behalf of my client in respect of the proposed housing allocation on Land to the Rear of Haslingden Cricket Club; Housing Allocation Reference H52.

The contents of the Housing Land Update (EL10.001) is noted. We confirm that we continue to agree with the Council's conclusions in respect of the quantum of development attributed to site Reference H52, insofar as we concur that the estimated yield of 30 dwellings is expected to be delivered in full within years 1 – 5 of the Plan.

However, to provide the Inspectors with an update, a very positive meeting was held at the end of May between the Council, Sport England, the ECB, and ourselves along with Haslingden Cricket Club and their chosen development partner B&E Boys Ltd. The conclusion from that meeting was that all parties would be agreeable to a new mixed-use policy being included in the Local Plan, to replace site H52, which relates specifically to the delivery of 30 dwellings in conjunction with the retention and improvement of the existing sports facilities at Haslingden Cricket Club. The precise wording of that site-specific policy has been drafted by ourselves and agreed with both Sport England and the ECB. The policy is now with Rossendale Council and discussions are ongoing between all parties to refine it with the view to this being presented to the Inspectors very soon.

We do however, wish to put on record that the Council (and other statutory partners) must be mindful that any proposal for new housing on the subject site will be intrinsically linked to the costs associated with the delivery of the improvements to Haslingden Cricket Club's sports facilities. The financial viability and associated costs with delivering those improvements should be regarded as abnormal costs, and full account will therefore need to be taken of these when the Council is considering the details of any scheme for the new housing. Revenue generated by the construction and sale of the housing will be used to deliver the improvements to the sports facilities, which will bring about significant benefits for the local community and wider Borough. On behalf of our client we have consistently made the Council aware that viability will play a role in the delivery of the draft allocation H52 given the intrinsic link between the housing and the cricket club. This is why we remain confident, with the agreement of Sport England and the ECB, that a site-specific mixed-use policy will not only deliver the housing which forms part of the Council's housing delivery strategy, but will also result in the safeguarding, and much-required improvement of, the existing sports facilities.

I trust the above will be forwarded to the Inspectors for their consideration as part of this current consultation.

Kind regards,
Beverley

Beverley Moss BA(Hons) Mplan MRTPI

Associate

Hourigan Connolly



From: Forward Planning <forwardplanning@rossendalebc.gov.uk>
Sent: 02 June 2021 14:41
Subject: Technical Consultation - Housing and Employment Updates

Dear Sir / Madam,

You are receiving this email because you have either expressed an interest to be kept informed about the Rossendale Local Plan or have previously commented on it.

The Planning Inspectors have requested further information relating to the housing requirement and the implications that the recently published Local Housing Need figure, based on the Government's Standard Method, may have on other policies within the emerging Local Plan, for example, the employment land requirement. The Council has responded to these requests within the Housing Update and the Employment Update, which can be viewed here https://www.rossendale.gov.uk/downloads/download/11460/examination_library_10_-_consultation_on_housing_and_employment_land_updates

This technical consultation for both documents will end at **5pm on Wednesday 16 June 2021**. Comments should be emailed to the Forward Planning Team at forwardplanning@rossendalebc.gov.uk.

In accordance with the Note on the Statement of Community Involvement re Covid-19 and consultation arrangements ([document EL6.015](#)), the Council has placed documents on the Council's website and will make paper copies available at the One Stop Shop to be viewed on an **appointment basis** as and when the One Stop Shop is open.

Please note that your comments will be sent to the Local Plan Inspectors and published on the Council's website, including your name, however no personal contact details such as telephone numbers or emails will be published. Please note that anonymous comments will not be accepted.

If you have any queries regarding this consultation, please do not hesitate to contact the Forward Planning Team at forwardplanning@rossendalebc.gov.uk.

Regards,

Forward Planning Team

Rossendale Borough Council

Telephone: 01706 252415 /252418 /252411 /252412

Website: www.rossendale.gov.uk

Beverley Moss

From: Daniel Connolly
Sent: 22 June 2021 10:07
To: Fiona Pudge; Beverley Moss
Cc: Anne Storah; Suzanne Redfern MBE
Subject: Re: Haslingden Cricket Club - DRAFT Mixed-Use Policy

Understood, Fiona. Another good reason for a mixed-use policy to tie all these things up.

Best,

Daniel

Daniel Connolly

Executive Director
Hourigan Connolly

Sent from iPhone

From: Fiona Pudge <Fiona.Pudge@sportengland.org>
Sent: Tuesday, June 22, 2021 9:34:48 AM

[REDACTED]
[REDACTED]
Subject: RE: Haslingden Cricket Club - DRAFT Mixed-Use Policy

Morning Daniel

Thank you for the confirmation below.

Just to clarify the reason for a noise assessment isn't just in relation to activities from the pavilion but the sound of cricket against bat and shouting. Over the years we've had a number of cases where housing has been built immediately adjacent to an existing cricket ground and the new residents have made complaints directly to the Council. This has led to restrictions in the hours of use and in some cases stopping the use altogether. As you can appreciate neither myself, ECB or Club would wish to see this happen. A Noise Assessment may recommend the introduction of physical acoustic barriers (fencing and/or bunds) and those physical features would need to be integrated into any subsequent planning application. From experience it's best to include Noise/Lighting/Ballstrike assessments as a requirement in the policy rather than leave it to chance as part of a planning application. We have had instances where individual LPA Planning Officers are not aware of either SE's statutory remit and/or the requirement for these types of assessments to mitigate impacts hence the need to include as a policy requirement.

Kind Regards

Fiona Pudge Planning Manager [REDACTED]

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

From: Daniel Connolly <daniel.connolly@houriganconnolly.com>
Sent: 07 June 2021 10:03

[REDACTED]
Subject: RE: Haslingden Cricket Club - DRAFT Mixed-Use Policy

Fiona,

Thank you to you and Sue for your quick response. Beverley doesn't work on Monday or Friday so I will respond in the interest of expediency.

I agree that the policy referencing needs tidying up but we wanted to present a "starter for ten". You are correct, we've proposed a new mixed use policy (policy M6), to be listed in the same way as other mixed-use allocations in the Plan. Beverley and I will defer to Anne on the correct referencing.

As regards your final point, relating to noise etc., currently the club (and club house in particular) operates on an unrestricted basis (in planning terms), which represents their fall-back. They do though enforce their own limits to operation to be neighbourly. I will speak to the club on this element and the proposed amendments to the policy in general and come back to everyone. I would envisage that any use of the new pavilion would be restricted by condition in any event by Anne's development management colleagues.

Many thanks for you input.

Regards,

Daniel

Daniel Connolly BA(Hons) DipTP MRTPI

Executive Director



From: Fiona Pudge <Fiona.Pudge@sportengland.org>



Subject: RE: Haslingden Cricket Club - DRAFT Mixed-Use Policy

Good afternoon all

Please find attached Sport England's comments and suggestions for amendment on the draft policy.

Anne: there's a query in there for you so if you can reply to me and Beverley that would be appreciated.

Kind Regards

Fiona Pudge Planning Manager 

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)



[REDACTED]
Subject: Haslingden Cricket Club - DRAFT Mixed-Use Policy

Afternoon ladies.

As agreed at this morning's meeting please find attached a revised DRAFT Mixed-Use Policy.

[@Anne Sturah](#) - I have entitled the policy 'M6' to continue the numbering of the other mixed-use policies proposed in the Local Plan.

We are hopeful that you agree that the DRAFT proposed policy text, parameters plan and policy explanation cover all the points discussed in the meeting.

Please read and provide your comments / concerns / agreement to the DRAFT so that we can reach a point whereby the Council can include a revised Mixed-Use Site Allocation Policy as part of the Main Modifications stage in the emerging Local Plan which is agreed by all parties.

We look forward to hearing from you at your earliest opportunity.

Thank you for your time this morning.

Regards,
Beverley

Beverley Moss BA(Hons) Mplan MRTPI

Associate

Hourigan Connolly

A: WeWork, 1 St. Peter's Square, Manchester, M2 3DE

A: Hubflow, 65-69 Dublin Road, Belfast, BT2 7HG

W: www.houriganconnolly.com

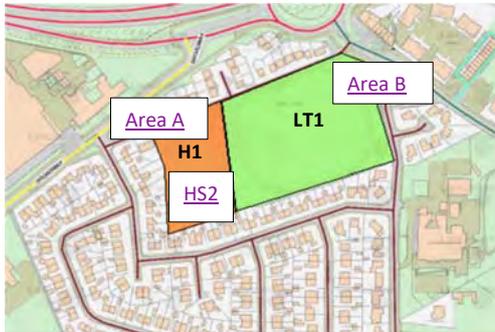


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b) A masterplan for the whole site to be submitted as part of a detailed planning application in accordance with the parameters plan. The planning application must meet the following criteria:

- i) Retain adequate land and facilities, at least an equivalent quantity of land and ancillary facilities to accord with Policy LT1 for the continued operation of Haslingden Cricket Club including the provision of a pitch, practice net area, and an element of car parking to serve the cricket club.
- ii) Include for the provision of a new, relocated pavilion to serve the cricket club and other local community functions.
- iii) Provide for the relocation of the practice pitch off-site to land at Haslingden High School.
- iv) Provide satisfactory measures to protect both the proposed dwellings and surrounding existing dwellings from the risk of ball strike from the adjacent cricket pitch, where adequate safety margins are not in place. The measures should be informed by a Ball Strike Risk Assessment and Mitigation Strategy.
- v) Provide satisfactory measures to protect both the proposed dwellings and surrounding existing dwellings from noise from the adjacent cricket ground. The measures should be informed by a Noise Assessment and Mitigation Strategy.
- vi) Deliver a maximum of 3030 houses in the western part of the site to the rear of the existing properties on Grasmere Road.

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Commented [SG12]: Fiona's wording 'retain at least an equivalent quantity land is likely to be an issue as this implies (in my view) that all of the existing facilities – including the practice pitch referenced in (iii) – will be retained as part of the masterplan.

Is there enough space within the area labelled LT1 to provide this? It seems unlikely that LT1 can provide the provision of a pitch, practice net area, element of car parking (which as existing is fairly large), and a practice pitch. **And what about the Pavilion, where will that go – is there enough land in LT1/Area B?**

If SE are happy for the practice pitch to be relocated and not be considered as part equivalent quantity to be provided as part of the masterplan then maybe it might be okay, but this seems to be a change in direction from previous discussions.

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Commented [FP11]: To meet Sport England Playing Field Policy and para 97(b) of the NPPF, and LT1 requirements this needs to reflect the wording of those two policies.

Can I suggest:

Retain at least an equivalent quantity of land and ancillary facilities to accord with Policy LT1....

Commented [AS13]: Where – in area A or B? How big? Eg to include licenced premises, changing room improvements. I think the location needs to be set out in the policy.

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- vii) Provide satisfactory vehicular access to the new residential properties off Private Lane.
- viii) Provide a satisfactory new vehicular access from Clod Lane to serve the cricket ground.
- ix) Provide a safe and convenient pedestrian footpath access to the site, linking it to the footpath network.
- c) A phasing and infrastructure delivery schedule for the entire allocation.
- d) An agreed programme of implementation in accordance with the masterplan.
- e) The protection of the existing Sport and Recreational Facilities within the Mixed-Use Site Allocation boundaries in perpetuity subject to the criteria set out in Strategic Policy LT1.

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Explanation

Bent Gate cricket ground is home to Haslingden Cricket Club. The mixed-use allocation seeks to secure the future of sports provision on-site through an element of enabling residential development. The site is located within the urban boundary in Haslingden, being surrounded in all directions by existing built development.

Deleted: , whose facilities are sub-standard

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Deleted: Housing site H52 can only

Deleted: be delivered as part of a comprehensive approach to the redevelopment of the whole site

The facilities at Haslingden Cricket Club, although well used, are dated and in need of improvement. Additional male and female changing facilities are required, and these should be accessible for people with disabilities. Some of the land on the western side of the Cricket Club is surplus to the Cricket Club's requirements and considered suitable for additional new housing. The sale of this land for housing would finance the redevelopment of the Cricket Club immediately to the east of this housing allocation.

This land includes a training wicket which, although not in use currently, will need to be replaced. The Cricket Club has been in discussions with Haslingden High School to provide at the School a non-turf cricket wicket, capable of being used by the school for both practice and matches and which the Cricket Club would be able to use as needed. This will need to be provided prior to the approval of any planning application.

Some of this land is currently used for parking by the Cricket Club on match days and for other social events held in the Pavilion. This car parking will need to be accommodated elsewhere and it is expected that both the Pavilion and the associated required car parking may be relocated to the eastern side of the Cricket Ground, with access removed from Private Lane and a new access created from Clod Lane. Although in principle the Pavilion and parking can be relocated development management matters will need to be resolved to the satisfaction of the Local Planning Authority and the Highway Authority.

The Playing Pitch Strategy (2016) identifies sufficient availability of cricket pitches within Rossendale to meet existing and future demand. Should the emerging Playing Pitch and Outdoor Sports Study identify that there is now a deficit, the applicants will need to replace the amount of land lost. This will be in addition to relocating the training wicket to the playing pitches at Haslingden High School.

Overall, this scheme in principle will provide several benefits. It will enable the School to participate more effectively in cricket both as part of the curriculum and competitively, thus enabling more cricket to be played. In addition funding will be available for the Cricket Club to re-invest in its facilities and become more sustainable as a sporting facility. Furthermore, the new housing will contribute to the Borough's housing supply. Any planning application will need to satisfy other policies relating to design and access, and suitably address other issues including amenity and noise, parking, materials, affordable housing, open space requirements etc.

This comprehensive redevelopment approach to the site has been the subject of discussions with the England and Wales Cricket Board and Sport England and they confirm their endorsement subject to the on-going protection of the sports and recreation facilities on site, including mitigating any potential prejudicial impact from the proposed housing that could affect the operation of the cricket ground either from incidents of ball strike and/or noise complaints from residents.

This conjoined approach will provide additional new homes in line with the Council's housing strategy and secure the long-term sustainability of the sport and recreation facilities used by Haslingden Cricket Club.

Commented [FP16]: This is to ensure para 182 of the NPPF 'agent of change' principle is taken into consideration. In addition, part of Sport England's statutory remit is to ensure developments located immediately adjacent to, or within 80m of the cricket wicket, do not have a prejudicial impact on the cricket ground. We've had a growing number of instances where housing has been approved but subsequent complaints from residents has led to the operation hours of the cricket club being severely reduced or the use having to cease altogether.

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ROSSENDALE LOCAL PLAN 2019 – 2034

CONSULTATION ON SCHEDULE OF PROPOSED MAIN MODIFICATIONS
(SEPTEMBER 2021)

CONSULTATION DEADLINE: 15 OCTOBER 2021

RESPONDENT: B&E BOYS LTD (**RESPONDENT REF. 5192¹**)

REPRESENTATION: HEATH HILL HOUSE (WOODLAND MOUNT) BOOTH
ROAD, STACKSTEADS, BACUP -
PROPOSED ALLOCATION H28 (PREVIOUSLY H32)

**COMMENTS ON: MM008: POLICY H28 – SUPPORT FOR
MODIFICATION.
POLICIES MAP MODIFICATIONS – MODIFICATION
REQUIRED.**

APPENDICIES

Appendix A Location Plan and Proposed Site Layout – planning application 2021/0215

Appendix B Council's Policy Consultation Response – planning application 2021/0215

Appendix C Planning Statement – planning application 2021/0215

INTRODUCTION

1.1 Rossendale Borough Council has issued its Schedule of Proposed Main Modifications for comment. The consultation will end on Friday 15th October 2021. The key documents subject to the current consultation are:

- i) Schedule of Proposed Main Modifications to the Publication (Regulation 19) Draft Plan (September 2021).
- ii) An accompanying schedule details minor Additional Modifications which include factual updates, corrections and formatting changes.
- iii) A schedule of changes to the Policies Map (August 2021).

¹ Respondent Reference Number as per Hearings held in September & October 2019

MM008: POLICY H28 – SUPPORT FOR MODIFICATION

- 1.2 The Table 7 contained at MM008 of the Schedule of Proposed Main Modifications sets out the Housing Site Allocations. The numbering of the proposed allocations has been changed, with the subject site at Booth Road / Woodland Mount (also known as Heath Hill House) now being allocated as H28 (previously known as H32):

H32 H28	Booth Road/Woodland Mount, Brandwood	0.35	40-14	29 40	Years 1-5	Greenfield	Housing	HS2	
------------	---	------	------------------	---------------------	--------------	------------	---------	-----	--

- 1.3 We confirm our agreement to the proposed modifications as shown in the Table above. On behalf of the landowner, we confirm that we are confident the allocated land is capable of delivering 14 no. units within years 1 – 5.

POLICIES MAP MODIFICATIONS – MODIFICATION REQUIRED

- 1.4 As submitted in our previous Representations, the Policies Map should be amended to include additional land at the proposed allocated site H28.
- 1.5 We confirmed at the Examination Hearings in October 2019, that the site had been the subject of positive pre-application discussions with Officers for residential development of 14no. dwellings. The indicative layout which was presented at the Examination Hearing (also included in our Hearing Statement) and which formed the pre-application discussions with the Council was included in our previous Representation (March 2021).
- 1.6 Officers agreed at those pre-application discussions that the layout was acceptable in principle – there was no concerns raised about the small element of land which is currently located within the Green Belt.
- 1.7 Hourigan Connolly has since submitted a planning application to the Council for the residential development of the subject land for 14 no. dwellings. The application was given the reference 2021/0215 and was registered on 21 April 2021. However, following discussions with the Council, the Applicant regretfully agreed that the application would be withdrawn, this being actioned on 05 October 2021. The reasons for the decision to withdraw were twofold. Firstly, an ecological matter which came to light during the course of the planning application being determined needed to be addressed and the time required to do that did not fit in with the Council's target date for presenting the application to the Planning Committee. The Council also raised issues with the proposed layout and design. The second reason was an objection in principle from the Council's policy team; this is discussed in further detail at Paragraph 1.10 below.
- 1.8 The location plan and proposed site layout submitted with that planning application are contained at **Appendix A**, for information purposes.
- 1.9 For the avoidance of doubt, the Applicant was wholly prepared to address the technical matters during the course of the application, but time constraints set out by the Council meant that this

would not be achievable, and the application was reluctantly withdrawn. For the benefit of the Inspector, the necessary additional technical work is nearing completion and work undertaken thus far confirms that there is a technical solution to all of those issues raised (ecology, layout and design), and a resubmission planning application will be submitted to the Council in the very near future. The main headline from this work is that there are no unsurmountable technical reasons why housing cannot be successfully delivered at the proposed allocated land.

- 1.10 As noted above, the Council raised a Policy objection to the planning application. Despite the application having been registered in April 2021, and the Council being fully aware of the site being a draft allocation housing site, the Policy consultation response was not received until 28 September 2021. The consultation response is contained at **Appendix B**. The Inspector will read that the consultation response focuses on the development of that element of land within the application site which is in the Green Belt. The Council's position, in relation to the (withdrawn) planning application is that there are no very special circumstances to justify the release of this small parcel of land from the Green Belt.
- 1.11 In their consultation response, the Council also refer to the Green Belt Study (contained in the Local Plan Evidence Base) noting that that part of the subject land which is included in the Green Belt, forms part of a wider area of land identified in that study as Parcel 53 - the Green Belt study did not consider the land contained in the parcel to be released from the Green Belt. The Council state that the Green Belt Study explains that in respect of Purpose 2 of the Green Belt Parcel 53 performs strongly, and in respect of Purpose 3 of the Green Belt, Parcel 53 performs moderately.
- 1.12 The conclusions of the Green Belt Study are noted and understood, however the small parcel of land which is proposed to be released from the Green Belt was not subject to a specific assessment in the Green Belt Study, it simply formed part of a wider, much large parcel.
- 1.13 In any event, it is our position that the land makes no contribution to the purposes of including land within the Green Belt. This minor incursion into the Green Belt would in no way whatsoever have any adverse impact on the importance of the Green Belt in this location, for the reasons discussed previously and herein.
- 1.14 The Council's Draft Policies Map currently indicates that the (now withdrawn) proposed residential layout is dissected by the boundary line which separates the urban boundary and the Green Belt. As submitted previously, there is a small parcel of land which currently sits in the Green Belt, as note in our previously Representation, and repeated below for convenience:

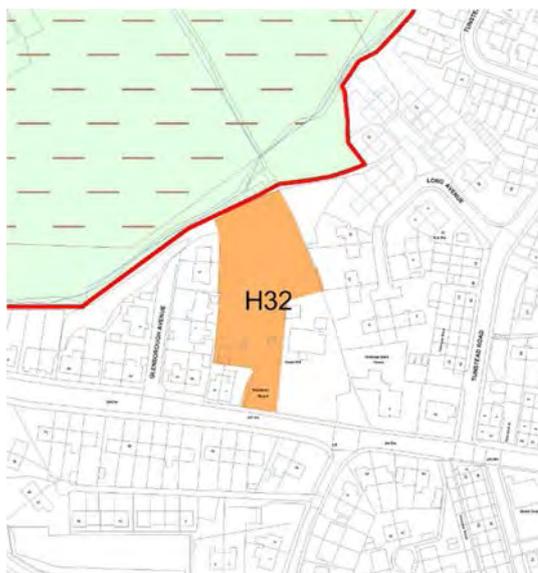


Figure 1.1 Extract from Submission Version Policies Map



Figure 1.2 Extract from Proposed layout tabled at pre-application meeting with approximate Green Belt area identified by green shading following route of existing PROW

- 1.15 On the basis of the current drafting of the Policies Map, all of the land north of the existing route of the Public Right of Way (PROW) which dissects the site (east to west) would be positioned within the Green Belt.
- 1.16 To assist the Inspector, **Appendix C** contains the Planning Statement which was submitted with the planning application (reference 2021/0215). That Planning Statement sets out, (refer to Paragraph 7.13 of Chapter 7 and Paragraph 8.25 of Chapter 8), the very special circumstances which justify the reasons why the land should be released from the Green Belt.
- 1.17 The key point we make at this stage in the emerging Local Plan process is that the development of the land at draft allocation H28 has always intended to include the small element of land which is in the Green Belt; the indicative proposed site layouts submitted to the Local Plan process and the subsequent layout submitted with the planning application, have always included the land currently within the Green Belt.
- 1.18 We continue to request that the urban boundary line be amended so that the whole of the site is located in the urban boundary and that therefore requires an alteration to the Green Belt boundary.

EXCEPTIONAL CIRCUMSTANCES: ALTER GREEN BELT BOUNDARY

- 1.19 The emerging Local Plan includes numerous amendments to the Green Belt and urban boundaries. The Council has established exceptional circumstances for the release of land from the Green Belt across the Borough in order to deliver the Council’s identified housing requirements over the Plan period.
- 1.20 National planning policy (Paragraph 136 of the Framework) states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need

for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

- 1.21 Having regard to national policy and the aims that defining Green Belt boundaries in development plans should seek to achieve, it is regarded that the following is applicable in considering an alteration to the Policies Map in relation to the subject site and proposed housing allocation H28.
- 1.22 The Council has established that there is an evidenced and fully justified need to update the Green Belt boundary. The Submission Local Plan Policies Maps include a number of proposed major and minor updates to the Green Belt and urban boundary which are required to deliver the identified strategic housing requirement.
- 1.23 The draft allocation site is in a sustainable location and would therefore be consistent with the emerging plan's strategy to meeting identified requirements for sustainable development.
- 1.24 The part of the subject site which is currently in the Green Belt is not necessary to maintain the openness of the Green Belt. The land is bound by existing trees, a stream and timber fencing and sandwiched by existing development and the PROW. It is not accessible by the public and makes no contribution to the five purposes of the Green Belt.
- 1.25 There would be no need to alter the Green Belt boundary in this location at the end of plan period.
- 1.26 The subject site is in a single ownership and presents an opportunity to develop out a discrete area of development for 14no. units as part of the proposed allocation H28. The northern boundary line of the application site is defined by an existing stream and represents a sensible 'rounding off' of the urban boundary in this part of Stacksteads.
- 1.27 The boundary between the Green Belt and the urban boundary would be clearly defined by an existing stream which is an existing physical and permanent feature. In their Policy consultee response to the (withdrawn) application the Council consider that the PROW is a '*robust and permanent boundary to the Green Belt / Urban Boundary*'. However, it is widely accepted that a PROW is capable of being diverted and at present, there is nothing to prevent the PROW route being diverted in this instance. The PROW is not a reliable permanent feature, and therefore if the PROW were to move, the Green Belt boundary would be nothing more than an arbitrary line on a plan which didn't follow a physical and permanent feature on the ground. In the alternative, the existing watercourse is a physical and permanent feature and we submit it is the more appropriate boundary to delineate the Green Belt boundary.
- 1.28 There are clear exceptional circumstances which support an update to Policies Map so that the line of the stream along the northern boundary of the subject site forms the boundary between the Green Belt and the urban area.
- 1.29 The small area of land which currently sits within the Green Belt does not meet the tests of Green Belt policy in so far as the land:
- a) Is not essential to check the sprawl of a large built-up area.
 - b) Is not necessary to prevent neighbouring towns merging.

- c) Has a strong relationship with the existing urban area and the sense of openness is limited. Furthermore, existing buildings at Glenborough Avenue and Lord Avenue mark out the limits of the existing urban area. The subject site would not go beyond these limits and therefore inclusion of the land within the urban boundary would not constitute encroachment.
- d) Does not preserve the setting and special character of a historic town.
- e) Is associated with, and forms part of, land associated with a private garden and which has been allocated for housing in the urban area.

1.30 To conclude, there are fully evidenced and justified exceptional circumstances to update the Policies Map as discussed above and release the land from the Green Belt.

CONCLUSION

1.31 The Council has provided full and justified evidence that the Green Belt boundary around the Borough of Rossendale is required in the emerging Local Plan.

1.32 It has been shown in this, and previous Representations, that the Green Belt boundary should be altered in Stacksteads to enable the land at the subject site to be delivered holistically and comprehensively within the first five years of the plan period.

1.33 The subject site is known as Woodland Mount or Heath Hill House, on Booth Road in Stacksteads. The site is in a single ownership and is made up of private garden land which is bordered on all sides by trees. There are no environmental or statutory designations or other technical considerations that would prejudice the residential development of the site². The site is sustainably located and is capable of delivering housing now.

1.34 To conclude therefore, the Council's Main Modification MM08 is **supported**. However, the Policies Map requires **additional Modification** to address the concerns raised above in respect of Policy H28, Booth Road / Woodland Mount (also known as Heath Hill House).

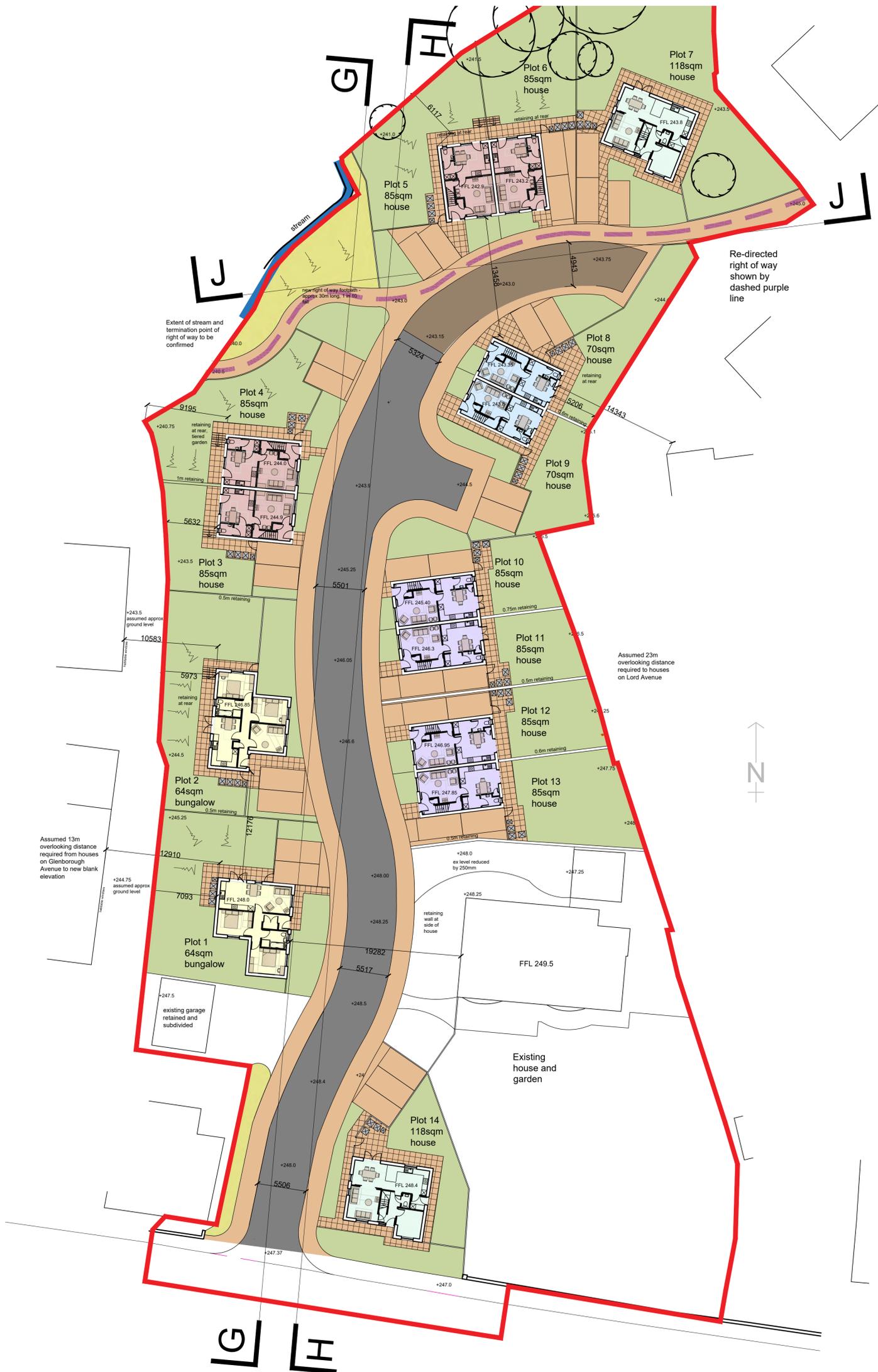
1.35 Hourigan Connolly reserves the right to submit comments at future stages to not only supplement Representations contained in this Statement, but also in addition to all other Representations submitted at previous stages of the emerging Local Plan in relation to the subject site.

² Technical issues were raised during the determination of the (withdrawn) planning application, but these are being addressed and can be satisfactorily resolved. A resubmission planning application will be submitted in the near future.

Appendix 1



DRAWING REFERENCE: HH_001_LP
 DATE: 23/03/2021
 PLAN: LOCATION PLAN
 CLIENT: BROTHER DEVELOPMENTS LTD
 SITE: HEATH HILL HOUSE, BOOTH ROAD,
 STACKSTEADS, BACUP, OL13 0SF



- 2no. 2 bed houses at 118sqm
- 4no. 3 bed houses at 85sqm (Type A)
- 4no. 3 bed houses at 85sqm (Type B)
- 2no. 4 bed houses at 118sqm

Total - 14no units

Schedule of Materials

- Walling Stone: 140mm coursed Edenhall Darstone Walling - Natural.
- Facing Brick: Carlton Brick - 65mm Flamborough Gold.
- Heads & Cills: Semi-dry cast - Buff.
- Roof tiles: Quinn Western Slate - Slate Grey.
- Fascias and soffits: uPVC - Black.
- Dormer Roof Units: GRP - Lead effect with black fascias.
- Windows and Door Frames: uPVC - external Anthracite Grey RAL 7016, internal white.
- Front Door Canopies: GRP - Lead effect/Anthracite Grey RAL 7016.

- Paving: Tobermore 600 x 600 x 40mm Textured - Charcoal.
- Gravel to borders: 20mm Autumn Gold.
- Private drives and general footpaths: Tarmac
- Block paving to shared drives: Tobermore Pedesta 50mm Brindle.
- Highway - hot rolled asphalt

P12	Highway and parking amended	19.5.21	MH	BB
P11	Boundary corrected	13.3.21	MH	BB
P10	Boundary corrected	3.3.20	MH	BB
P9	Footpath revised, materials added	27.2.20	MH	BB
P8	Planning issue	25.2.20	MH	BB
P7	Sizes corrected	16.2.20	MH	BB
P6	Layout updated	3.2.20	MH	BB
P5	Redline boundary revised	20.12.19	MH	BB
P4	Minor adjustments made	26.11.19	MH	BB
P3	Drawing prepared for pre-app	31.1.19	MH	BB
P2	Revised to suit client comments	22.10.18	MH	BB
P1	Issued for comment	9.10.18	MH	BB
Issue	Description	Date	Drawn	Checked

Drawing Status
P - Planning | T - Tender | C - Construction | R - As Record

For Planning

tadw architects

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Ph 0161 477 6158 Fx 0161 480 8342 mail@tadw.co.uk www.tadw.co.uk

Client **B&E Boys Ltd**

Job **Heath Hill House Bacup**

Title **Proposed Site Plan**

Scale **1:250 @ A1**

Note - Prints from PDF files may not be to scale, check accuracy against scale



Job Number 811264	Drawing Number 11	Issue P12
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Appendix 2

Policy Responses to Development Management

Date: 28 September 2021

1. Application No: 2021/0215

2. Site details/Address: Heath Hill, Booth Road, Stacksteads

3. Proposal: 14 houses

4. Checks

4a Housing application?

Yes/No

4b Inside Urban Boundary?

Yes/No

4c Greenbelt?

Yes/No (part)

4d Site allocated for another use / area i.e. employment land?

Yes/No

4e Emerging Local Plan allocation/designation?

4f Flood risk zone?

4g Greenfield or Brownfield?

GF/BF/Mix

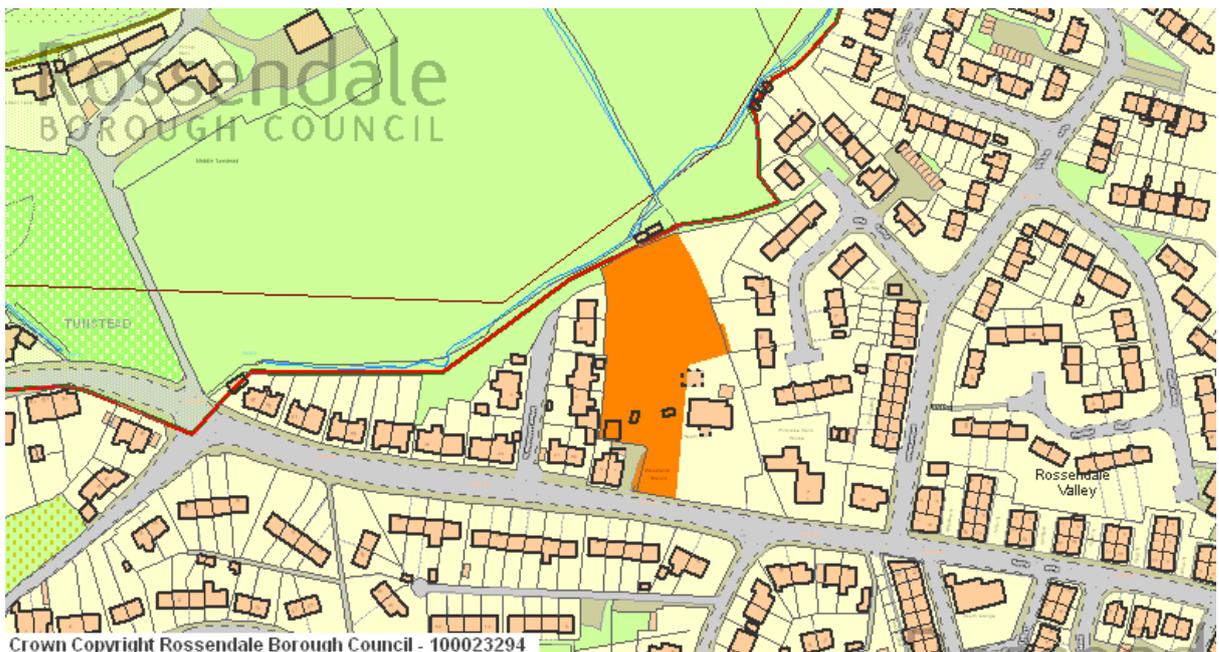
4h Allocation Core Strategy? N/A

4i Allocation emerging Local Plan – H32

Designations

The adopted Core Strategy designates most of the application site in the Urban Boundary. However, a small section to the north east is within the Green Belt. Three units are proposed to be located within this part of the site.

The emerging Local Plan allocates the land that is within the Urban Boundary for new housing. This is referenced as H32 in the Submission Version, renumbered H28 in the [Main Modifications version](#), currently out for consultation. No changes are proposed to the Green Belt boundary. Please see the boundary of the allocation below:



The Green Belt Study that the Council commissioned as an Evidence Base document to guide the release of Green Belt identifies this area of the Green Belt as Parcel 53 and does not consider the land contained in the parcel to be released from the Green Belt. Three of the proposed dwellings are contained within this wider parcel. Please see extract from Figure 4.7.4 from the 2016 Green Belt Study which relates to wider parcel of land, referenced as Parcel 53.

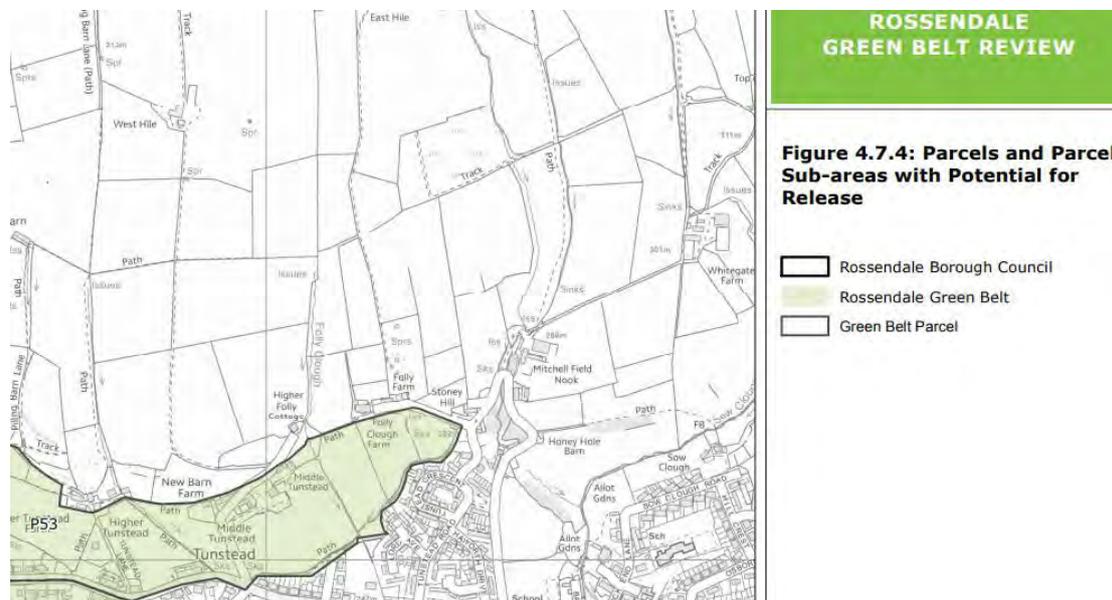


Figure 4.7.4: Parcels and Parcel Sub-areas with Potential for Release

The Study explains that in respect of Purpose 2 of the Green Belt, which is to prevent neighbouring towns merging into one another, Parcel 53 performs strongly. The Study notes:

This parcel is located between the settlements of Rawtenstall/Waterfoot and Stacksteads, adjoining the settlements edges. The settlements are within very close proximity at this point (within 0.5km) and have good intervisibility across the parcel. The parcel forms part of the settlement gap and, along with neighbouring parcels to the south, is of critical importance and plays an essential role in preventing the erosion of the visual and physical gap between the two towns. The parcel contains some urban development along Booth Road; any new urban development and subsequent loss of openness could lead to the physical coalescence and the perception of the neighbouring towns merging at this point.

The Study highlights Purpose 3 of the Green Belt which is to assist in the safeguarding of the countryside from encroachment – this parcel performs moderately noting:

There is a relatively strong sense of encroachment within the parcel as a result of rows of residential properties located along Booth Road, a small cluster of residential properties in the north-east, a large area of hardstanding in the west, and the visual influence of the adjoining urban edge. The majority of the parcel comprises pastoral farmland that displays characteristics of the open countryside, however encroachment has detracted from these characteristics, consequently the parcel lacks an intact and strong rural character. The Green Belt designation in this parcel is considered to make an important contribution to safeguarding a large area of open countryside to the north from encroachment.

The northern edge of the housing allocation follows the Green Belt boundary, which in turn aligns with the Public Right of Way. It is the Council's view that this is a defensible and robust boundary for the Green Belt, and there are no overriding reasons to amend the boundary from the 1995 Rossendale District Local Plan Proposals Map.

The applicant considers in their Planning Statement that the Green Belt boundary should be amended to follow the line of the stream rather than the Public Right of Way, in order to release some land from the Green Belt, enlarge the site allocation boundary and build an additional three dwellings. The NPPF (para 143 states that when defining Green Belt boundaries, plans should (f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. However, the stream has not formed the boundary to the Green Belt in proximity to this site; rather it follows the Public Right of Way, which is clearly defined.

National Planning Policy Framework

The NPPF attaches great importance to Green Belts, ensuring they remain open and permanent and prevent urban sprawl (para 138). Changes to existing Green Belt boundaries should be made through the local plan process (para 140). As explained above the Council has undertaken a Green Belt review and this has informed the emerging Local Plan. No changes have been proposed or requested at this location.

Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances (para 147). Para 148 notes that *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.*

The applicant is suggesting that very special circumstances apply for including the Green Belt land in their planning application (in para 7.20 of their Statement). However, we do not consider these points comply with NPPF para 148 which clearly states "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". Even the delivery of three housing units is not considered to be significant to demonstrate very special circumstances.

Rossendale is able to demonstrate a greater than 5 year supply of housing. However, the Housing Delivery Test currently indicates that the delivery of housing was less than 75% of the housing requirement over the previous three years. Nevertheless it is not considered that allowing these three dwellings on land that is within the Green Belt can be considered very special circumstances.

Summary

I will focus on the acceptability of residential development on the Green Belt part of the site. I consider that residential development in the Green Belt is inappropriate in accordance with the NPPF and that very special

circumstances to justify the release of this land from the Green Belt have not been demonstrated. Allowing this land to be developed will constitute encroachment into the Green Belt and is considered will be detrimental to providing a robust and permanent boundary to the Green Belt/Urban Boundary, currently satisfied by the Public Right of Way. The Green Belt Study does not support the release of this land from the Green Belt.

This proposed change to the Green Belt has not been consulted on and is not supported by the Green Belt Review. Creating a new boundary to the Green Belt using the stream is not considered appropriate, given that there is an existing more robust and defensible boundary which is provided by the Public Right of Way. Therefore new housing in the Green Belt is not considered to be appropriate.

Appendix 3

PLANNING STATEMENT

APPLICANT:

Brother Development Ltd

SITE:

Heath Hill House, Booth Road, Stacksteads, Bacup

DATE:

31 March 2021

Report Drafted By	Report Checked By	Report Approved By
BM	DC	DC
23.03.2021	31.03.2021	31.03.2021

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Appendix 1 Pre-Application Response from Rossendale Borough Council

1. INTRODUCTION

BRIEF

- 1.1 Hourigan Connolly is instructed by Brother Development Ltd (hereafter referred to as “the applicant”) to prepare this Planning Statement in support of a planning application to Rossendale Borough Council (hereafter referred to as “the Council”) relating to land known as Heath Hill House, Booth Road, Stacksteads, Bacup, Rossendale.
- 1.2 The description of development given in the planning application form is:
- “Full Planning Application for the Erection of 14no. Residential Dwellings with Associated Car Parking and Hard and Soft Landscaping and including diversion of existing public right of way”.*
- 1.3 The application is accompanied by a set of supporting plans and drawings, and accompanying reports which deal with technical matters (refer to Chapter 4).

BACKGROUND

- 1.4 The site comprises vacant land, owned solely by the applicant, which can be accessed directly from Booth Road. The majority of the site is within the urban boundary, with a small area located within the Green Belt, has good accessibility credentials and is in a sustainable location. The majority of the site forms part of the Council’s proposed housing allocations in the emerging Local Plan.
- 1.5 Under Paragraph 59 of the National Planning Policy Framework (hereafter referred to as the ‘Framework’), all Councils in England are required to significantly boost the supply of housing and, under Paragraph 73, must maintain a 5-year supply of deliverable housing land.
- 1.6 The Council cannot currently demonstrate a deliverable 5-year supply. In such circumstances, policies which are most important for determining applications for housing development are out-of-date and the presumption in favour of sustainable development applies (Paragraph 11 of the framework) to that area of the application site located in the urban boundary.
- 1.7 There are very special circumstances to support the proposed element of development which would be located in the Green Belt.
- 1.8 There are no known technical or legal encumbrances to the prompt implementation of the permission thereafter.
- 1.9 On receipt of a satisfactory planning permission, the applicants would build out themselves, and the scheme would contribute to housing land supply in Rossendale within the next 5 years.

PURPOSE

1.10 The purpose of this Planning Statement is as follows:

- To describe the site and surrounding area.
- To examine any relevant previous planning decisions that have been made in relation to the site.
- To identify any statutory or local planning-related designations affecting the site.
- To provide details of the scheme that is now being brought forward.
- To outline the pre-application discussions that have taken place.
- To outline the other documents submitted in support of the proposals.
- To consider the proposed development having regard to the provisions of the Development Plan.
- To consider any other material considerations.
- To outline the benefits of the scheme.
- To demonstrate that the planning balance lies clearly in favour of the proposals.

1.11 This document should be read in conjunction with the suite of documents submitted in support of the planning application.

2. THE SITE & SURROUNDING AREA

SITE LOCATION

- 2.1 The subject site is located on Booth Road and comprises a large existing residential plot associated with a vacant property known as Heath Hill House. The site measures an area of approximately 0.74 hectares and extends northwards on the northern side of Booth Road. The site sits in an established residential area of Stacksteads.



Figure. 2.1 – Site Location (circled in red)

SITE DESCRIPTION

- 2.2 The site is in single land ownership, being solely within the ownership of B&E Boys Ltd. The land forms part of a garden and detached building associated with Heath Hill House. This building was formerly a residential property but planning permission was granted on 28 August 2019 to change the use to a family residential assessment home (Use Class C2; Planning Application Reference 2019/0198). The planning permission has been implemented and the building is now used for a very worthwhile local service which provides care and assessment for up to 5 families (mostly mothers and babies) all of whom which reside permanently at another address but stay at Heath Hill House for the duration of their assessment only (which is approximately 12 weeks).
- 2.3 The application site forms the remaining part of the land around Heath Hill House which historically formed the large area of private garden land associated with the family home. There are three cabins / outbuildings positioned to the rear of the site, sitting just north of a footpath which dissects the site in two (this is discussed further in this Statement).

- 2.4 The site is bounded on all sides by trees and a timber fence surrounds the site on the west, north and eastern boundaries, with the frontage of the site (southern boundary) being dominated by a stone wall and mature soft landscaping along Booth Road. The site is flanked by residential properties to the east, west and south and to the north is open countryside.

SURROUNDING AREA AND SUSTAINABILITY CREDENTIALS

- 2.5 The site is located in Stacksteads, part of the ribbon of development that links Rawtenstall to Bacup. There are good bus links available along Booth Road to both of these local centres. Booth Road and the nearby Newchurch Road act as local traffic arteries and they are characterised by a mixture of commercial and residential properties.
- 2.6 Both the Design and Access and the Transport Statement address the sustainability of the site setting out how the site is within a reasonable walking distance of local amenities and facilities, noting that the nearest bus stop is within a 200m walk along Booth Road.
- 2.7 Accordingly, the site benefits from a reasonably high level of accessibility by the main non-car modes of transport

SUMMARY

- 2.8 In summary the site comprises an unremarkable area of vacant land located in an accessible, predominantly residential area. The site is sustainably located and benefits from good transport links to the wider Borough and beyond. The application site is in an excellent location for residential development, which will complement the existing neighbourhood in the immediate locality.

3. STATUTORY AND OTHER DESIGNATIONS

HERITAGE DESIGNATIONS

- 3.1 There are no known Listed Buildings or Scheduled Ancient Monuments on the site, or which would be affected by the proposed development. The site is not within or adjacent to any identified Conservation Areas.

FLOOD RISK AND DRAINAGE

- 3.2 The application is supported by a Drainage Design Statement which includes a Preliminary Drainage Strategy prepared by Ironside Farrar. As indicated in Figure 3.1 below, the site is located in Flood Zone 1 where there is a low probability of flooding:

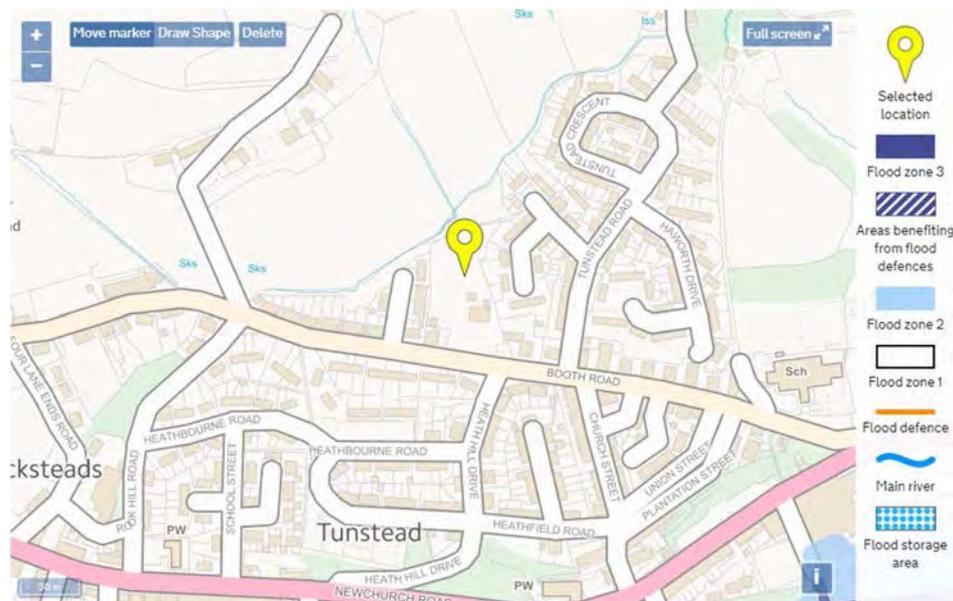


Figure 3.1 – Flood Risk Map. Source: www.flood-map-for-planning.service.gov.uk

- 3.3 There is a small watercourse (a stream) which runs along the northern boundary of the site; this is not classed as a main river by the Environment Agency.
- 3.4 The sewer records for the site indicate no public sewers crossing the site itself and no surface water sewers in the vicinity of the site to which a connection could be made. There is an open watercourse running from north east to south west along the northern boundary; the watercourse runs immediately adjacent to the site and it is proposed that this would act as receptor for the runoff from the site; a connection for surface water can be made to the watercourse.
- 3.5 It is intended the discharge from the site will be restricted to the existing runoff rate in all events up to and including the 100year event plus 40% climate change. The drainage hierarchy has been considered in line with NPPG which states surface runoff should be discharged as high up the hierarchy as possible. Having regard to the ground conditions of the site the site is not suitable

for the use of infiltration and this is why it is proposed that the surface water will be discharged to the adjacent stream, with foul drainage to be connected to the existing foul sewer network as detailed in the accompanying technical report.

HIGHWAYS AND ACCESS

- 3.6 The accompanying Transport Statement and Proposed Access Drawing demonstrate that the site is sustainably located, and vehicles can safely access and egress the site in a forward movement.

GROUND CONDITIONS

- 3.7 The accompanying preliminary Risk Assessment confirms that the potential risks from contamination are considered to be very low. Further site investigation is recommended prior to any development commencing to ensure any potential risks have been identified.

PUBLIC RIGHTS OF WAY

- 3.8 Figure 3.2 below shows that the site is dissected by an existing Public Right of Way (PROW) in the form of a footpath. The PROW runs in an east-west direction linking up Lord Avenue and Booth Road – Footpath number 14-1-FP_55. The proposals provide for a continuation of this route of the PROW, with a minor diversion which follows the proposed design of the internal highway layout as part of a formalised footpath surface. Access into and out of the site via the PROW will remain in the same positions as existing and will be facilitated by an appropriate access arrangement to be agreed with Lancashire Highways Authority, such as a stile or gate.



Figure. 3.2 – Route of existing PROW indicated with purple dashed line. Extent of planning application area edged in red. Source: MARIO Maps Lancashire

ECOLOGY

- 3.9 The proposals are designed to sit within the existing landscape in a sensitive manner and will be read against the backdrop of existing ribbon development, but also has regard to the open countryside to the north.
- 3.10 The application is supported by an Ecological Appraisal, which concludes that the site comprises of short cropped, semi-improved grassland, scattered trees, scrub and marshy grassland along with areas of hardstanding, the main house and other storage buildings. Survey work has been undertaken on the habitats within the site boundaries including the ditch for the stream and in the building itself. No signs of protected species, including water vole and bats, were found on site and the nearest pond (10m from the site boundary) was surveyed as 'poor' suitability for Great Crested Newts. Two bird nests were observed in trees within the site boundaries, and birds were seen to be using the site for foraging.
- 3.11 The Appraisal concludes that the feature with the highest biodiversity value were the mature trees and it is recommended that existing mature trees be retained if possible. The site is dominated by habitats of limited value to wildlife at present however the Appraisal recommends measures such as using native species etc. in the development proposals to take advantage of opportunities to enhance ecological interest. This has informed the final proposal designs as discussed below.
- 3.12 To conclude, there are no statutory restrictions to development on landscape or ecology grounds.

TREE PRESERVATION ORDERS

- 3.13 There are no Tree Preservation Orders (TPO) affected by the proposed development.
- 3.14 An Arboricultural Impact Assessment accompanies the planning application and confirms that the proposals would require the removal of six trees, 15 groups, one partial group, and one partial hedge, all of which are categorised as low quality (i.e. 'C' category). Additionally, as also detailed in Table B (which is replicated below), two trees and two groups are considered unsuitable for retention as they have relatively short projected remaining life expectancies of less than ten years due to the presence of substantial structural defects and/or significant physiological decline. Further, the majority of the surveyed trees have previously been very heavily topped and are consequently of poor quality and subsequently provide little amenity value to the site or the surrounding area.

Table B: Projected Arboricultural Impacts of Proposed Development & Other Tree Removal Proposals

	Ret. Cats.	Removals necessary to implement development	Removals recommended regardless of development	Total no. of removals
Those of a high quality that should be afforded appropriate consideration in the context of development	'A'	-	-	-
Those of a moderate quality that should be afforded appropriate consideration in the context of development	'B'	-	-	-
Those of a low quality that should be afforded appropriate consideration in the context of development	'C'	T2, T3, T5, T6, T8, T9, G1 (Part), G2, G4, G5, G7, G8, G9, G10, G11, G12, G13, G14, G16, G17, G18, G19, H1 (Part)	-	6 Trees 15 Groups 1 Part Group 1 Part Hedge
Those that should be removed for sound management reasons regardless of plans	'U'	-	T4, T10, G3, G6	2 Trees, 2 Groups
Totals		6 Trees 15 Groups 1 Part Group 1 Part Hedge	2 Trees 2 Groups	= 8 Trees, 17 Groups, part of 1 Group & part of 1 Hedge in Total

Figure 3.3 Table B taken from page 5 of the Arboricultural Impact Assessment

3.15 A landscaping scheme accompanies the planning application (prepared by PGLA) and confirms that the proposals include the retention of many existing trees in conjunction with the planting of a number of new trees and other elements of soft landscaping across the site in both private garden and in publicly accessible areas.

SUMMARY

3.16 In summary, the site is not constrained by any local, regional or national statutory or non-statutory designations that would preclude its development in the manner proposed.

4. THE PROPOSED SCHEME

DESCRIPTION OF DEVELOPMENT

4.1 The description of development given in the planning application forms is:

“Full Planning Application for the Erection of 14no. Residential Dwellings with Associated Car Parking and Hard and Soft Landscaping including diversion of public right of way”.

DEVELOPMENT CONCEPT



Figure 4.1 Proposed Layout

4.2 Figure 4.1 is taken from Page 18 of the Design and Access Statement. The proposed schedule of accommodation is:

- Two bed bungalows 64 sqm 2 units
- Two bed houses 70 sqm 2 units
- Three bed houses 85sqm 8 units
- Four bed houses 118sqm 2 units

TOTAL: 14 units

- 4.3 The proposed scheme has been carefully considered in order to not only respond to current market demand and identified local needs, but to also reflect the character of the neighbouring residential areas to complement the existing community and having regard to the open countryside to the immediate north.
- 4.4 The scheme has been carefully designed to accord with local and national planning policy to achieve a high-quality environment in keeping with the local character.
- 4.5 The above accommodation schedule confirms that the new homes would meet or indeed exceed the two, three and four bed guidelines laid down in the Nationally Described Space Standards. The Design and Access Statement confirms at Page 8:

'The constraints affecting the site have significantly restricted options for the site layout. The general shape of the plot and the need to accommodate the gradients across the site has resulted in a layout with a central spine road off which houses are arranged to either side.

The properties themselves have been placed to maintain suitable overlooking distances from adjacent residential accommodation. This has greatly constrained the footprint options for a number of the new houses. In addition new habitable windows have been carefully placed to ensure privacy distances are not compromised. This is particularly true of plots 1 and 2.

Plots 1 and 2 have also been designed as single storey units to respect the change in level between the site and the existing houses on Glenborough Avenue. This has the added advantage of providing highly desirable bungalow units on the site. The internal layout of these properties has been configured to appeal to older buyers, as it is envisaged that they might be purchased by downsizers. If so this in turn would release additional family homes onto the local market.

In order to ensure the maintenance of the existing right of way across the site a new formal path has been introduced linking Lord Avenue to Glenborough Avenue. In addition an area of open space has been left adjacent to the stream in order to provide a physical and visual link between the new development and the Green Belt beyond.'

- 4.6 In terms of external appearance, the following principles have been adopted (Page 9 of Design and Access Statement):

'...the elevations have been configured to ensure that stone is used on sensitive frontages, such as those facing Booth Road and the Green Belt. Natural slate is proposed for the roofs to further lessen the impact of development. Where possible native hedgerows are proposed to mark out site boundaries.

Window styles around the site vary considerably, with both vertical and horizontal configurations being common. Similar variety has been introduced into the new development, with stone cills and heads used to reflect the features found in the existing local housing stock.'

- 4.7 The proposals provide for 2no. parking spaces per dwelling (200% provision), which is entirely appropriate for the location and type of property proposed.
- 4.8 In order to ensure the maintenance of the existing PROW, a new formal path has been introduced linking Lord Avenue to Glenborough Avenue. In addition, an area of open space has been left adjacent to the stream in order to provide a physical and visual link between the new development and the open vista to the north.

5. PRE-APPLICATION CONSULTATION

PRE-APPLICATION DISCUSSIONS WITH THE COUNCIL

- 5.1 The principle of the proposal was discussed informally with Officers on 18 August 2019, and written feedback was provided on 06 September 2019. That feedback is contained in **Appendix 1**.
- 5.2 It was confirmed that the Council could not demonstrate a 5-year supply of homes and that the site had been included in the emerging Local Plan as a site allocated for housing (Site reference H32) and therefore the principle of redevelopment for housing was deemed to be acceptable. The Council made it clear that the main issues for consideration would be detailed design, impact on highways, impact on biodiversity, financial contributions associated with planning obligations.
- 5.3 All of the matters previously discussed with the Local Planning Authority have been addressed in this submission and as set out in this Planning Statement.
- 5.4 For the purposes of clarification, the proposals tabled at pre-application discussions are the same as those submitted today; the proposed layout for 14no. units remains the same. However, it must be highlighted at this point that the proposed residential allocation in the emerging Local Plan does not include the area of land within the Green Belt. Hourigan Connolly has submitted a number of Representations to the emerging Local Plan¹ in respect of this proposed allocated land and in each of those Representations (dating back to 2018), indicative layouts all included the area of Green Belt land. To date the Council has not commented on those Representations and inclusion of the land in the Green Belt within the proposed housing allocation. This is discussed in further detail in the proceeding Chapters.

PUBLIC CONSULTATION

- 5.5 Discussions with Officers were held in 2019, and since that time the ownership of the application land has changed owing to matters of probate. For the avoidance of doubt, the layout submitted with this application submission remains the same as that discussed with the Council. The Applicant opted not to undertake public consultation on the proposals during the year 2020 as it had not been appropriate to do so given the legal matters that had been in hand at the time.
- 5.6 Following legal completion of the change in ownership details, the Applicant is keen to progress straight to a planning application submission and does not feel that, with regard this specific planning application, the local community would be in any way prejudiced by not having been consulted on the proposals prior to a planning application being submitted. In any event,

¹ A Representation was most recently submitted to the Second Tranche Consultation which closed on Friday 19 March 2021.

neighbours and any other interested parties will have the opportunity to comment on the proposals as part of the formal planning application determination process. The proposals are relatively small-scale in nature and due care and consideration has been paid by the project team to ensure the proposals make a positive contribution to the local residential community in Stacksteads.

6. DOCUMENTS SUBMITTED IN SUPPORT OF THE FULL PLANNING APPLICATION

6.1 This Planning Statement should be read in conjunction with the following suite of documents which are submitted in support of the full planning application:

- Application forms and Certificates.
- Location Plan.
- Detailed Plans and Elevations including a Topographical Survey (tadw architects).
- Design and Access Statement (tadw architects).
- Financial Viability Appraisal (Duff and Phelps).
- Phase I – Preliminary Risk Assessment (BEK Enviro Ltd).
- Tree Survey Report (Bowland).
- Landscape Proposals (PGLA).
- Preliminary Ecological Appraisal (Simply Ecology).
- Drainage Design Statement (Ironsides Farrar).
- Transport Statement (DTPC).
- Access Layout (DTPC).

7. THE DEVELOPMENT PLAN INCLUDING AFFORDABLE HOUSING STATEMENT

INTRODUCTION

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

“where in making any determination under the planning Acts, regard is to be had to the Development Plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise”.

7.2 In this instance, the Development Plan comprises:

- The Core Strategy Development Plan Document (2011-2026).
- Saved policies in the Rossendale Local Plan.

ROSSENDALE BOROUGH COUNCIL CORE STRATEGY DPD

7.3 The Rossendale Borough Council Core Strategy Development Plan Document (DPD) was adopted on 8th November 2011. The Core Strategy replaces the Rossendale Local Plan (adopted 1995) in its entirety except for a number of saved policies shown on the Policies map which have been continued in the Core Strategy.

SITE SPECIFIC POLICY DESIGNATIONS

7.4 Of those policies saved, only Local Plan policy DS1 (The Urban Boundary) remains relevant as this illustrates the designated urban boundary on the Policies map. Policy DS1 is continued in the Core Strategy via Policy 1 (General Development Locations and Principles) which is discussed in the following paragraphs.

7.5 As mentioned above, the majority of the site is located within the urban boundary, with a small portion of the site being located in the Green Belt. The Council’s online Policies map is difficult to read at a detailed level – it is difficult to zoom in – but it is our interpretation that that part of the site which sits north of the PROW is within the Green Belt, with the remainder of the land being located within the urban boundary at Stacksteads.

7.6 An extract of the Policies map is shown at Figure 7.1 along with an extract from the Existing Site plan with the area of land within the Green Belt identified. On this basis Plots 5, 6 and 7 of the proposed development would be positioned within the Green Belt. As new development in the Green belt is strictly controlled, this element of the proposals would be contrary to the Development Plan, however it will be set out in the following Paragraphs that very special

circumstances exist which outweigh any potential harm the development would have on the Green Belt.

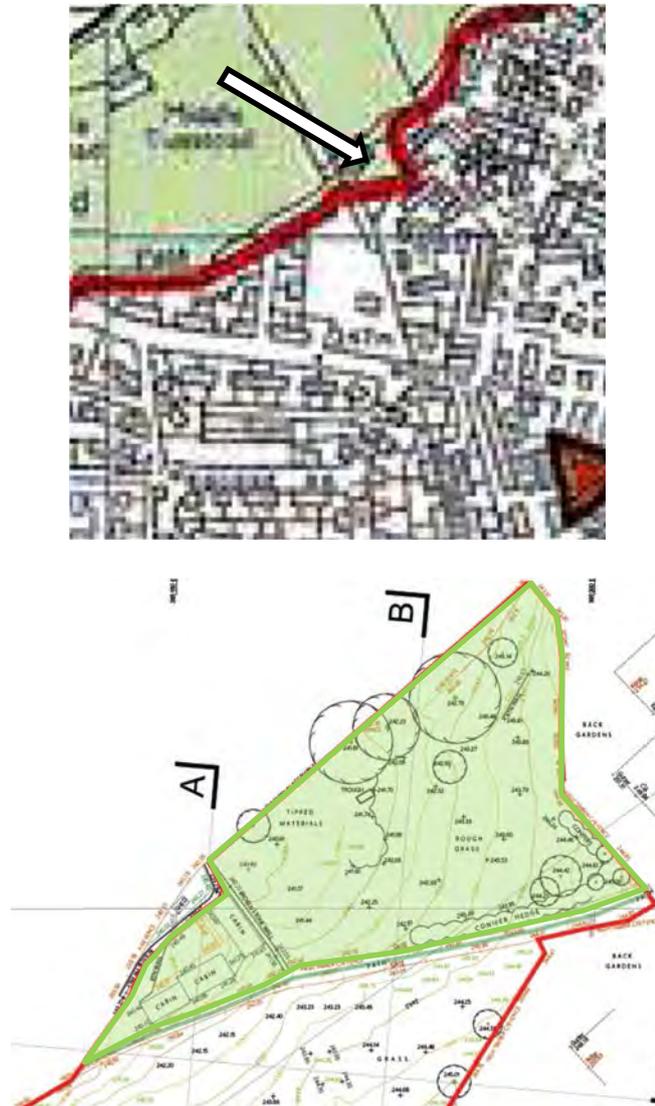


Figure 7.1 Extract from Core Strategy Policies map with arrow indicating area of Green Belt. Extract from Existing Site Plan with Green Belt identified by green shading.

GENERAL POLICY CONSIDERATIONS

AVP2 – STRATEGY FOR BACUP, STACKSTEADS, BRITANIA AND WEIR

7.7 AVP 2 is one of the six Area Visions covering a number of broad areas in the Borough. The Area Visions set out the strengths, weaknesses, opportunities and threats of each area and proposes a way forward to address these. As Figure 7.2 indicates, one of the issues in this area is the dominance of terraced housing and generally low house prices:

Strengths, Opportunities and Key Issues

Issues	Strengths and Opportunities
<ul style="list-style-type: none"> ■ Poor public realm with high number of vacant, dilapidated buildings ■ Anti-social behaviour, poor general health, low skills and educational attainment, high crime, ageing and declining population (18-24 year olds moving away) ■ Employment market focused on traditional manufacturing sector ■ Housing market failure with generally low house prices and dominance of terraced housing ■ Perception of isolation – ‘at the end of 3 valleys’ ■ Difficult to deliver sites due to constraints – contamination etc ■ Limited opportunities for private sector investment 	<ul style="list-style-type: none"> ■ Distinct sense of place and heritage value ■ Good access to countryside with potential for tourism and outdoor leisure opportunities (e.g. mountain bike trails, bridleways, hill walking) ■ Close to employment opportunities in Rochdale and Burnley ■ Quality Bus Corridor linking to Accrington and Rochdale but poor access to Manchester City Centre ■ Renewable energy potential (wind, hydroelectric etc) ■ Proximity to and attraction of the Adrenaline Gateway project and Lee Quarry SSSI ■ Cultural facilities, such as, The Royal Court Theatre

Figure 7.2 Extract from Core Strategy – Supporting text to Policy AV2

7.8 The Policy confirms that larger housing schemes will be accommodated in Stacksteads and Bacup where they contribute to Housing Market Renewal and other such programmes.

7.9 The proposals comprise the redevelopment of a site within the urban boundary of Stacksteads for 14no. new family homes. The proposals therefore wholly comply with Policy AV2.

POLICY 1 – PRINCIPLE OF DEVELOPMENT

- 7.10 **Policy 1** states that development within the Borough should take place within the defined urban boundary (with reference to Local Plan Saved Policy DS1) and should be of a size and nature appropriate to the size and role of the settlement.
- 7.11 Policy 1 also sets out the local planning authority's Overall Development Approach, confirming that the local planning authority will seek to enhance the quality and sustainability of places and individual developments by taking into account a number of criteria when considering individual planning applications.
- 7.12 The following points demonstrate that the development of the site would address those criterions relevant to the key planning considerations relating to the residential proposals:
- Make best use of under-used, vacant land.
 - Complement and enhance the surrounding area through the use of inclusive design and locally distinctive materials which enhances the character and heritage of Rossendale. The Design and Access Statement shows how the proposals are justified in terms of height, mass and scale. The existing housing stock in the vicinity is diverse in aesthetic and scale. The new homes would blend in with the surrounding existing built form, but be recognisably distinct, thereby simultaneously strengthening the local identity. The carefully designed development proposals would not only complement and enhance the surrounding areas and the character of the Borough but would result in high quality and sustainable buildings that would be attractive to families hoping to live in Stacksteads.
 - The majority of the site is located within the urban boundary in close proximity to existing infrastructure, which facilitates the day-to-day functioning of the surrounding settlement areas. The proposals comprise the erection of 14 houses; a development which is of an appropriate scale in relation to the size of the local area.
 - The supporting technical reports demonstrate that the development would link into the existing drainage and highways systems without having a significant impact on the capacity.
 - The site is located within Flood Zone 1 and flood risk is not therefore a concern or constraint at this site.
 - The proposed drainage strategy is to connect into the existing public surface water sewer at a point to be determined by detailed design, and subject to a maximum allowable rate of discharge.

- The development comprises high quality design and adopts sustainable construction methods, meeting the requirements of the exemplar guidance contained in the Building for Life 12 (BfL12) guide published in 2012.
- The proposals maximise access by public transport, walking and cycling being located within an existing urban area with a range of local facilities and amenities in very close proximity. in a manner that promotes safe and inclusive communities and promote co-location of services and facilities.
- High quality soft landscaping to enhance the biodiversity value of the site.
- Contributes to maintaining and creating sustainable and inclusive communities.

7.13 However, it cannot be ignored that part of the site is located in the Green Belt and in that regard, consideration must also be given to the section of Policy 1 which covers the Green Belt and Countryside:

'Proposals outside the urban boundary will be determined in accordance with the relevant national and local planning guidance...

...A review of the existing Green Belt boundaries (Local Plan Saved Policy DS3) in the areas shown on Figure (number to be determined) will be undertaken as part of the Site Allocations DPD. The review will be limited to small scale changes and cartographic corrections that do not adversely impact on the purposes of including land in the Green Belt.

The review will be based on a consistent process that reflects current national guidance. Any changes to the Green Belt would only be made in exceptional circumstances and would take into account each of the following criteria:

- *Effect on openness*
- *The overall integrity of the Green Belt*
- *Checking the unrestricted sprawl of large built-up areas and other settlements*
- *The significance of local and longer distance views into and out of the site*
- *Preventing neighbouring towns and villages merging into one another*
- *The maintenance of an appreciable open zone around and between built-up areas*
- *The safeguarding of the countryside from encroachment*

- *To preserve the setting and special character of historic towns and settlements*
- *Whether it assists urban regeneration by encouraging the recycling of derelict and other urban land*
- *Where small scale selective rounding off of Green Belt boundaries would promote sustainable development opportunities.'*

7.14 The Council is preparing a new Local Plan – The Rossendale Local Plan 2019-2034. Following a series of Local Plan Examination in Public Hearings in Autumn 2019, the Inspectors asked for additional evidence. The Council has already held one period of consultation in December 2020 on new evidence and most recently held a second tranche of consultation which closed on 19 March 2021². The emerging Local Plan includes amendments to the Green Belt and urban boundaries. The Council has established exceptional circumstances for the release of land from the Green Belt across the Borough in order to deliver the Council's identified housing requirements over the Plan period.

7.15 National planning policy (Paragraph 136 of the Framework³) states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

7.16 Having regard to national policy and the aims that defining Green Belt boundaries in development plans should seek to achieve, it is regarded that the following is applicable in this particular planning application:

- a) The Council has established that there is an evidenced and fully justified need to update the Green Belt boundary. The Submission Local Plan Policies Maps include a number of proposed major and minor updates to the Green Belt and urban boundary which are required to deliver the identified strategic housing requirement.
- b) All of the new homes within the application site would be wholly located in a sustainable location and would therefore be consistent with the emerging plan's strategy to meeting identified requirements for sustainable development.
- c) The parcel of land in the Green Belt is not necessary to maintain the openness of the Green Belt in this location. The land is bound by existing

² A Representation was submitted to the Second Tranche Consultation relating to the application site.

³ Refer to Paragraph 8.25 of this Planning Statement for further details.

trees, a stream and timber fencing and sandwiched by existing development and a public right of way. It is not accessible by the public and makes no contribution to the five purposes of the Green Belt.

- d) There would be no need to alter the Green Belt boundary in this location at the end of plan period. The application site is in a single ownership and presents an opportunity to develop out a discrete area of development for 14no. units as part of a comprehensive and holistic scheme. The northern boundary line of the application site is defined by an existing stream and represents a sensible 'rounding off' of the urban boundary in this part of Stacksteads.
- e) The boundary between the Green Belt and the urban boundary would be clearly defined by an existing stream which is an existing physical and permanent feature.

7.17 As the extract from the draft Submission Policies Map shows below (Figure 7.3), looking at the boundary of the Green Belt in this location from west to east, the boundary is drawn by following the route of the existing stream to the north. This is except where the boundary 'kinks in' to follow the route of the PROW which dissects the application site, follows the rear gardens of properties on Lord Avenue, and then re-joins the stream again.

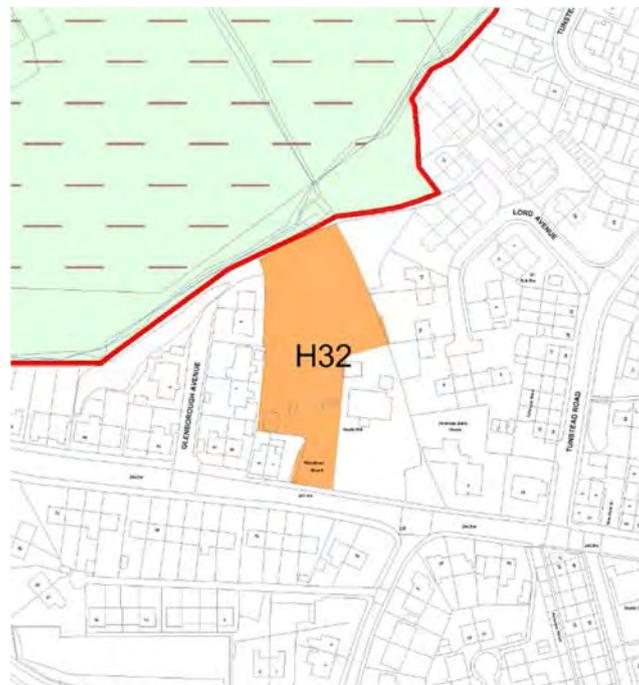


Figure 7.3 Extract from Submission Version Policies Map

7.18 Having demonstrated the above, there are clearly exceptional circumstances which support an update to the Policies Map so that the line of the stream along the northern boundary of the application site forms the boundary between the Green Belt and the urban area, and that the parcel of land be released from the Green Belt. There is nothing to prevent the PROW route

being diverted, it is not a permanent feature, and therefore if the route were to move the Green Belt boundary would be nothing more than an arbitrary line on a plan which didn't follow a physical and permanent feature on the ground.

7.19 We know that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (Paragraph 143 of the Framework), and that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt (Paragraph 144). 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.

7.20 In considering the specifics of this planning application case, the following comprise very special circumstances:

- The subject site has a strong relationship with the existing urban area and the sense of openness is limited.
- Existing buildings at Glenborough Avenue and Lord Avenue mark out the limits of the existing urban area. The subject site would not go beyond these limits and therefore inclusion of the land within the urban boundary would not constitute encroachment.
- The development of the site would result in a sensible rounding off of the settlement in this sustainable location.
- The development would not cause harm to any of the five purposes of including land in the Green Belt.
- The 3no. units in the Green Belt, along with the other 11no. proposed units would make a not insignificant contribution to the delivery of housing at a time when the Council cannot demonstrate a 5-year supply of housing land.
- The majority of the site is proposed to be allocated in the emerging Local Plan for housing.

7.21 These very special circumstances, when taken overall, clearly outweigh harm to the Green Belt and any other harm.

7.22 To conclude, there are fully evidenced and justified exceptional circumstances to update the Policies Map and release the land from the Green Belt.

7.23 Furthermore, very special circumstances have been demonstrated to bring forward a holistic approach to redeveloping sustainable vacant land in Stacksteads.

- 7.24 The proposals do not comply with Policy 1, but it has been demonstrated why this departure is justifiable and unique to this particular site. This is also supported by the fact that the tiled balance is engaged (Paragraph 11 of The Framework) – there is a presumption in favour of sustainable development (refer to Chapter 8 for further detail on this point).

POLICY 2 - MEETING ROSSENDALE'S HOUSING REQUIREMENT AND

POLICY 3 – DISTRIBUTION OF ADDITIONAL HOUSING

- 7.25 The Council is unable to currently demonstrate a five-year supply of deliverable housing sites based on Full Objectively Assessed Need (FOAN), and therefore certain Core Strategy policies concerned with the supply of housing cannot be considered up-to-date, in line with the National Planning Policy Framework. This includes Policies 2 and 3.
- 7.26 In any event, the application proposals comply with the relevant criteria set out in both policies and the proposals make a contribution to meeting the housing need in Rossendale.

POLICY 4 – AFFORDABLE HOUSING

- 7.27 **Policy 4** sets out how the delivery of affordable housing will be achieved in the Borough with a prescribed percentage requirement based on the number of dwellings proposed. Part 2 (c) states the following:

'Unless otherwise agreed with the Council, 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. Where the Council is not in agreement with the findings of the assessment an independent auditor will be appointed at the cost of the applicant, to, undertake a site-specific economic viability assessment to ensure that full affordability potential is reached.'

- 7.28 This planning application is supported by a Financial Viability Appraisal. The Appraisal looks at the details of the proposed development, the gross development value, the anticipated development costs and development profit requirements and concludes the following:

'The proposed development envisages the development of 14 dwellings comprising 2 x 2 bed detached bungalows, 2 x 3 bed semi-detached dwellings, 8 x 3 bed semi-detached dwellings and 2 x 4 bed detached dwellings.

In our opinion, in current market conditions, a prudent developer and in particular the majority of lenders would require a development profit of 17.5% to 20% of GDV in order to secure funding.

The total development costs including fees, finance and land costs are £2,250,103.

Our appraisal produces a development profit of £239,897 or 9.63% of GDV.

This scheme is considered to be marginally viable assuming a development of market housing with no affordable housing or Section 106 contributions. However, the applicant is in a position to proceed with the development as they have held the land for many years.'

- 7.29 On the basis of the detailed financial appraisal of the specifics of this project, it would simply not be viable to provide any affordable housing as part of the proposals. In that regard, the proposals comply with part 2 (c) of Policy 4.

POLICY 8: TRANSPORT PROPOSALS INCLUDING RAWTENSTALL-MANCHESTER RAILWAY LINK

- 7.30 **Policy 8** is primarily concerned with the development of transport improvements and increased provision with Rossendale and how this will be achieved.
- 7.31 The policy is not directly relevant to the proposed development aside from parking provision. Policy 8 is supported by Appendix 1 of the Core Strategy which sets out car parking standards in respect of proposed new developments in the Borough.
- 7.32 2no. car parking space is to be provided per dwelling. This 200% provision is considered acceptable to serve the 14no. New homes which are located in such a sustainable position in Stacksteads.

POLICY 9: ACCESSIBILITY

- 7.33 **Policy 9** aims to promote and encourage the use of public transport, cycling and walking. The supporting text to Policy 9 sets out targets for a minimum of 90% of new development to be within 400m of a bus stop with regular service. The site is sustainably located, something which is accepted by the Council.
- 7.34 The Design and Access Statement confirms the following:

'Booth Road and the nearby Newchurch Road act as local traffic arteries and they are characterised by a mixture of commercial and residential properties. As such the site is within easy walking distance of local retail outlets, chemists and dentists. Two medical practices are located within 2km of the site. A number of national supermarket chains have branches located at a similar distance.

The site is well served by education facilities. There is a nursery school within 100m and a second within 500m. There are also two primary schools within 500m, and two secondary schools can be found within 1km.

The site benefits from easy access to open countryside, and more formal recreation facilities can be found within 250m. This includes facilities for both toddlers and older children. Similarly gyms and outdoor football fields are available within 500m.'

POLICY 17 – ROSSENDALE'S GREEN INFRASTRUCTURE

7.35 **Policy 17** seeks to promote the protection, enhancement and where appropriate the expansion of the Green Infrastructure network by a number of measures. One of the measures is set out in Part 3 of the Policy:

'3. As part of the Council's response to climate change, new developments will be required to maximise the environmental risk management benefits of Green Infrastructure where possible through:

- a. Flood risk management (utilising Sustainable Drainage Systems).*
- b. Providing shade, cooling and carbon storage through the planting of appropriate vegetation and tree species.*
- c. Contributing to a reduction in air, water, noise and light pollution.'*

7.36 The proposals comply with the policy in the following ways:

- A drainage scheme appropriate to the scale of the proposals is proposed to comprehensively address flood risk management.
- A number of existing trees are to be retained and complemented by additional planting of new trees and other elements of soft landscaping.
- The new buildings will be constructed to the latest building regulation standards, which will include high levels of insulation to minimise domestic energy costs and thereby contributing to a reduction in air, water, noise and light pollution.

POLICY 18: BIODIVERSITY, GEODIVERSITY AND LANDSCAPE CONSERVATION

7.37 **Policy 18** aims to prevent detrimental impacts upon Rossendale's natural environment and requires that all new developments "avoid any loss of trees, woodland, hedgerows and other types of foliage and flora, and ensure that where necessary, developments make provision for new and replacement planting".

7.38 The application is accompanied by an ecological assessment which confirms that the vegetation to be cleared from the site has a low ecological significance in the local area and that there was no evidence of any protected species regularly occurring on site or surrounding areas. The proposals comprise a detailed landscaping plan which will result in net gain in biodiversity across the site.

7.39 A Tree Survey has been undertaken and the arboricultural information is submitted with this planning application, including an Arboricultural Impact Assessment and Method Statement which details the poor quality trees which will be removed to facilitate development. In that respect, it has been shown that the development would not have an impact on any ecological designations, nor would it have an unacceptable impact on any protected species.

POLICY 19 – CLIMATE CHANGE AND LOCAL AND ZERO CARBON SOURCES OF ENERGY

7.40 Policy 19 is a policy of two parts with part one relating to renewable and low power generation proposals which is not relevant to the consideration of this application. Part two however relates to all other developments and confirms that the council will promote mitigation of, and adaptation to, climate change by a number of measures. The table below sets out how the proposals accord with Policy 19:

Policy 19 Section Two	Compliance with Policy
Locating new development in sustainable locations, in line with Policy 1.	The site is located within a sustainable and accessible location with easy access to public modes of transport.
Energy efficient development.	The layout of the dwellinghouses makes best use of the topography of the site, utilising the natural resources in the most efficient way.
Natural passive heating & cooling systems incorporated into buildings.	Natural sunlight will be maximised in the properties. Natural shade will be provided by the soft landscaping.
Conserving and enhancing peatlands.	The site does not have an impact on the Borough’s peatlands.
Incorporate climate change benefits.	The landscape strategy incorporates the inclusion of additional planting.
Planning obligation for climate change adaptation measures.	N/A
Impact on flood risk.	The development would not have a detrimental impact on flood risk.
Implementation of SUDs.	The comprehensive drainage strategy would deal with the flow rate of water, to a rate agreed with United Utilities.
Incorporate water saving & recycling measures.	Adequate storage capacity for refuse and recycling bins are provided for each property. Measures to encourage rainwater harvesting will be incorporated into the scheme where appropriate.

POLICY 22 – PLANNING CONTRIBUTIONS

7.41 **Policy 22** confirms that where developments will create additional need for improvements/provision of services or facilities or exacerbate an existing deficiency, contributions will be sought to ensure that the appropriate enhancements/ improvements are made, and appropriate management arrangements are in place. However, importantly, the supporting text to Policy 22 notes the following:

'300. It is important that development costs including the cost of implementing planning agreements do not prejudice development that supports the Council's aspiration to see the regeneration and improvement of the Borough. If it is claimed that a development is unable to support the costs of a planning obligation (other than those essential to allow the development to proceed) then this could be the subject of negotiations. In such cases, the developer will have to demonstrate non viability via an "open book" approach.'

7.42 Pre-application feedback from the Council (contained in **Appendix 1**) sets out the contributions that the Council would expect the development proposals to deliver, such as public open space contribution, education provision, and affordable housing.

7.43 As mentioned above in the context of Policy 4 (affordable housing), this planning application is supported by a Financial Viability Appraisal. The Appraisal looks at the details of the proposed development, the gross development value, the anticipated development costs and development profit requirements and concludes that the development would not result in an industry-accepted developer profit.

7.44 On the basis of the detailed financial appraisal of the specifics of this project, it would simply not be viable to provide any financial contributions or provide any onsite affordable housing as part of the proposals. The development proposals would be prejudiced and would not be brought forward, which would be the antithesis of the Council's aspirations to delivery new, quality homes in the Borough. It has been shown that the development cannot deliver any planning contributions and therefore, whilst the proposals do not comply with Policy 22, there is sound evidence to support and justify this.

POLICY 23: PROMOTING HIGH QUALITY DESIGN AND SPACES

7.45 Policy 23 seeks to ensure that new developments considered by the Council are designed to the highest standard of design in order to create attractive and easy to use development across the Borough. The applicants' brief to the consultant team was to create an aspirational and high quality, sustainable residential community which provides much needed family housing for Rossendale with private amenity space and appropriate levels of parking.

7.46 The development would accord with the provisions of Policy 23 as the proposed dwellinghouses have been designed in accordance with Building for Life 12 (2012) and are designed to meet the

minimum requirements of Code for Sustainable Homes Level 3. The Design and Access Statement provides further details in respect of the criteria within Policy 23, demonstrating that the proposed development is designed to a high standard which responds to the local context, which is residential environs to the west, east and south, and open countryside to the north.

POLICY 24: PLANNING APPLICATION REQUIREMENTS

7.47 **Policy 24** builds up on the other policies of the Core Strategy, in particular the ‘Overall Development Approach’ set out in Policy 1 and the Design Principles set out in Policy 23. The Policy provides a clear indication of the principal development management issues that the local planning authority expects to be relevant when considering planning applications. The Policy also makes it clear that planning applications will be given positive consideration (our emphasis) subject to the relevant policy requirements.

7.48 It has been shown that the proposals have been subject to detailed technical considerations in relation to the issues of acknowledged importance relevant to the specifics of the site and the nature of the proposals and that the local planning authority should consider the planning application positively. However, for the sake of completeness, it is shown below how the development accords with the relevant requirements of Policy 24:

- The development has considered the on and off-site impacts of the scheme in terms of climate change, flood risk and biodiversity and identified the necessary mitigation measures.
- The dwellinghouses maximise environmental performance by adhering to Building for Life Principles and would be constructed to a minimum of CfSH Level 3.
- The development would make efficient use of under-used, vacant land, and would deliver social, economic and environmental benefits.
- The design of the scheme would positively contribute to the local distinctiveness, landscape and townscape.
- The development would be compatible with the neighbouring uses and surroundings.
- Landscaping forms an integral element of the proposals.
- The layout reflects the highest quality of design to ensure the amenity of the area is protected.
- The layout reflects ‘secured by design’ requirements.

- The site is located in a sustainable and accessible location with easy access to public transport and within close walking and cycling distance of local amenities and facilities.
- The dwellinghouses have been designed with flexibility in mind, i.e. staircases capable of adaptation for future stair lifts, and many ground floor rooms capable of dual function, to meet the requirements of 'Lifetime Homes'.
- The ground conditions have been considered (see the supporting Desk Study) and further investigations are recommended prior to any construction.

CONCLUSIONS

7.49 It has been demonstrated above that the proposed development complies with the provisions of the Development Plan and where it does not comply, there is sound justification for the non-compliance.

7.50 Commensurate with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the application should be approved unless material considerations indicate otherwise. Other material considerations are now addressed in the following Chapter.

8. OTHER MATERIAL CONSIDERATIONS

INTRODUCTION

8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

“In principle...any consideration which relates to the use and development of land is capable of being a planning consideration. Whether a particular consideration falling within that broad class is material in any given case will depend on the circumstances” (Stringer v MHLG 1971).

8.2 Material considerations must be genuine planning considerations, i.e. they must be related to the development and use of land in the public interest. The considerations must also fairly and reasonably relate to the application concerned (*R v Westminster CC ex-parte Monahan 1989 refers*).

8.3 The Courts are the arbiters of what constitutes a material consideration. All of the fundamental factors involved in land-use planning are included, such as the number, size, layout, siting, design and external appearance of buildings and the proposed means of access, together with landscaping, impact on the neighbourhood and the availability of infrastructure.

8.4 The Courts have also held that the Government’s statements of planning policy are material considerations which must be taken into account, where relevant, in decisions on planning applications. These statements cannot make irrelevant any matter which is a material consideration in a particular case. But where such statements indicate the weight that should be given to relevant considerations, decision-makers must have proper regard to them. If they elect not to follow relevant statements of the Government’s planning policy, they must give clear and convincing reasons (*E C Grandson and Co Ltd v SSE and Gillingham BC 1985 refers*).

8.5 Emerging policies, in the form of draft policy statements and guidance, can be regarded as material considerations, depending on the context. Their existence may indicate that a relevant policy is under review; and the circumstances which have led to that review may need to be taken into account.

8.6 In those cases where the Development Plan is not relevant, for example because there are no relevant policies, or policies in the DPDs pull in opposite directions so that there is no clear guide for a particular proposal, the planning application should be determined on its merits in the light of all the material considerations.

8.7 In this case the following material considerations are relevant.

NATIONAL PLANNING POLICY

THE NATIONAL PLANNING POLICY FRAMEWORK

8.8 National planning policy in relation to housing is to be found in the National Planning Policy Framework (hereafter referred to as the Framework) that should be afforded significant weight. A revised Framework was published on 19 February 2019.

ACHIEVING SUSTAINABLE DEVELOPMENT

8.9 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development, delivered through three interdependent objectives (economic, social and environmental). The table below sets out how the proposals would deliver these objectives.

Objective	What the Proposals Would Deliver
Economic	<p>The development of under-used vacant land would contribute to generating full-time equivalent (FTE) jobs within the construction industry over the build period, which would be a benefit to the economy of the local area.</p> <p>The new dwellings would reinvigorate an existing residential area and could encourage new residents into the Borough who would generate expenditure within the local economy, supporting local shops, services and businesses. This expenditure would in turn support jobs in the Borough as well as additional public sector jobs (e.g. teachers, doctors etc.) that would be generated as a direct consequence of the proposals.</p> <p>The proposals are fully commensurate with the economic dimension of sustainable development and would represent a welcomed contribution to the economy of the area.</p>
Social	<p>The proposals would make a contribution to the sense of community in Stacksteads. The proposals would also facilitate the creation of jobs within the local labour pool, both during construction and the operational phase.</p>
Environmental	<p>The proposals would not have an unacceptable impact on environmental issues and there is an opportunity to enhance the biodiversity of the site.</p>

THE PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

- 8.10 Paragraph 11 of the Framework states that decisions should apply a presumption in favour of sustainable development (also known as the tilted balance test) subject to Footnotes 6 and 7 of the Framework. Given the limited conflict with policies of the Development Plan and the absence of a 5-year supply of deliverable dwellings in Rossendale, Paragraph 11 criterion d) is relevant here.
- 8.11 The deficient housing land supply position is highly relevant in terms of decision taking principles because it means (having regard to the provisions of Footnote 7 of the Framework) that the presumption in favour of sustainable development test for decision taking (as set out in Paragraph 11 (sub Paragraphs c, d (i) and d (ii) of the Framework) is firmly engaged here.
- 8.12 Consequently, decision taking should have regard to the presumption in favour of sustainable development and in this case planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 8.13 For that part of the site which is in the Green Belt (and therefore where Footnote 6 of the Framework applies), it has been demonstrated in the previous Chapter that there is no clear reason for refusing the proposals. This is because:
- The Council has already established exceptional circumstances to update the Green Belt boundary in numerous locations across the Borough to deliver the identified housing requirement – refer to Paragraphs 7.14 – 7.18 above.
 - There are very special circumstances which outweigh the potential harm by reason of inappropriateness and any other harm resulting from the proposal – refer to Paragraphs 7.19 – 7.22 above.
 - The overall balance is that the proposals represent sustainable development and the benefits brought about by the delivery of 14no. new homes would outweigh any potential harm and conflict with the development plan.
- 8.14 The recent Judgement for 500 new homes in the Bradford Green Belt⁴ supports the above approach.

⁴ Called-in decision: Sun Lane and Ilkley Road, Burley n Wharfedale Nr Bradford - (Ref: 3208020 - 3 March 2021)

8.15 As such, the proposals represent a sustainable form of development; the benefits of granting planning permission are considered significant and are not to be ignored.

8.16 Moreover, the tilted balance approach of Paragraph 11 must be engaged in this case because there are very special circumstances which outweigh any potential harm.

DESIGN

8.17 The creation of high-quality buildings and places is outlined by the Government to be fundamental to what the planning and development process should achieve. A key element of sustainable development is good design, which should contribute positively to making places better for people. Paragraph 127 of the Framework sets out that planning policies and decisions should ensure that developments:

- a) Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) Are sympathetic to local character and history, including the surrounding built environment and landscaping setting;
- d) Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- e) Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses, and support local facilities and transport; and
- f) Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

8.18 The proposals comprise good quality and inclusive design, the scheme responds to the landscape within which it sits and to the surrounding residential area the type of housing and materials used.

8.19 The properties have been set on plots appropriate to the proportions of the house they are associated with, complementing the surrounding residential area which follows a similar precedent.

CONSIDERING DEVELOPMENT PROPOSALS

8.20 Paragraph 108 requires that in assessing applications for development it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) significant impacts from the development on the transport networks (in terms of capacity and congestion), or highway safety, can be cost effectively mitigated to an acceptable degree.

8.21 Paragraph 109 goes on to confirm that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or if the residual cumulative impacts on the road network would be severe.

8.22 There are no such issues in this instance.

ENVIRONMENT

8.23 The Framework also requires that development proposals should also prevent new and existing development from contributing to or being put at an unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

8.24 There will be no unacceptable impacts or risks to these various environmental matters.

PROTECTING GREEN BELT LAND

8.25 Paragraph 133 confirms that the government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. At Paragraph 134 it is confirmed that the Green Belt serves 5 purposes:

- a) *to check the unrestricted sprawl of large built-up areas;*
- b) *to prevent neighbouring towns merging into one another;*
- c) *to assist in safeguarding the countryside from encroachment;*
- d) *to preserve the setting and special character of historic towns; and*
- e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

8.26 Paragraph 136 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

8.27 Paragraph 139 states:

'When defining Green Belt boundaries, plans should:

a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;

b) not include land which it is unnecessary to keep permanently open;

c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'

8.28 It is considered that the small area of the application site which currently sits within the Green Belt does not meet the tests of Green Belt policy in so far as the land:

- a) Is not essential to check the sprawl of a large built-up area.
- b) Is not necessary to prevent neighbouring towns merging.
- c) Has a strong relationship with the existing urban area and the sense of openness is limited. Furthermore, existing buildings at Glenborough Avenue and Lord Avenue mark out the limits of the existing urban area. The subject site would not go beyond these limits and therefore inclusion of the land within the urban boundary would not constitute encroachment.
- d) Does not preserve the setting and special character of a historic town.
- e) Is associated with, and forms part of, land associated with a private garden and which has been allocated for housing in the urban area.

8.29 For proposals affecting the Green Belt, Paragraph 143 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. In this case, the very special circumstances are:

- The subject site has a strong relationship with the existing urban area and the sense of openness is limited.
- Existing buildings at Glenborough Avenue and Lord Avenue mark out the limits of the existing urban area. The subject site would not go beyond these limits and therefore inclusion of the land within the urban boundary would not constitute encroachment.
- The development of the site would result in a sensible rounding off of the settlement in this sustainable location.
- The development would not cause harm to any of the five purposes of including land in the Green Belt.
- The 3no. units in the Green Belt, along with the other 11no. proposed units would make a not insignificant contribution to the delivery of housing.
- The Council cannot demonstrate a 5-year supply of housing land – the supply is significantly lower than 5 years, and estimated by the Council to be somewhere between 2 and 4.3 years.
- The majority of the site is included in the emerging Local Plan as an allocated site for housing.

8.30 These very special circumstances, when taken overall, clearly outweigh harm to the Green Belt and any other harm.

8.31 In the proceeding Chapter and the above paragraphs, it has been demonstrated that there are exceptional circumstances to alter the Green Belt boundary in this location, and very special circumstances exist to grant planning permission for the development.

PLANNING PRACTICE GUIDANCE

8.32 Planning Practice Guidance (PPG) was launched on 6 March 2014 in its final form and has subsequently been updated on numerous occasions. The PPG replaces some 230 planning guidance documents but results in no amendments to the Framework.

8.33 Regarding design, Paragraph ID: 26-001-20140306 reiterates the guidance set out in the Framework; that good quality design is an integral part of sustainable development. Furthermore, the PPG notes that:

“Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations.”

- 8.34 The PPG makes it clear that planning policies and decisions should seek to ensure the physical environment supports the three strands of sustainable development (i.e. economic, social and environmental) and in doing so issues including the promotion of local character; designing safe connected and efficient streets; incorporating a network of greenspaces; promoting cohesive and vibrant neighbourhoods, should all be given careful consideration.
- 8.35 The PPG also reiterates the guidance set out in the Framework, that both Local Plans and planning decisions should be based upon and reflect the presumption in favour of sustainable development (Paragraph ID 21b-006-20140306 and ID 12-011-20140306).
- 8.36 This application submission has demonstrated how the proposals have addressed the key design issues above, and that the residential scheme comprises sustainable development.

NATIONAL DESIGN GUIDE

- 8.37 The National Design Guide was published in January 2021. The document notes that the Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. This National Design Guide illustrates how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It forms part of the Government’s collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.
- 8.38 The National Design Guide addresses the question of how we recognise well designed places, by outlining and illustrating the Government’s priorities for well-designed places in the form of ten characteristics – as shown at Figure 8.1 below:



Figure 8.1 - Part 2 of the National Design Guide – the 10 characteristics of well-designed places

8.39 The following table demonstrates how the scheme addresses these characteristics having regard to the site-specific constraints.

Characteristic	How the Proposals Achieve high-quality design
Context	The proposals understand the key features of the site and responds positively to the topography, typology of existing residential properties in the surroundings as well as the local vernacular and the open countryside to the north.
Identity	The proposals are visually attractive and distinctive
Built Form	The site is sustainable and within walking distance of the town centre. The new homes contribute to the sense of place and streetscene on Booth Road.
Movement	The proposals are safe and accessible for all with soft landscaping which softens the impact of the car parking.
Nature	Natural features form part of the careful design to provide attractive spaces, private gardens and a healthy natural environment which will enhance the biodiversity of the site.
Public Spaces	The small area of public space adjacent to the PROW and the stream (on the western boundary) will be managed by a management company to ensure longevity and attractiveness.
Uses	The new homes will contribute to the sense of community in this predominantly residential corner of the town centre.
Homes and buildings	The new homes will be adequate in size and provide good quality internal and external environments for future occupants, promoting health and well-being.
Resources	The proposals will make best use of underused, vacant land. The construction processes will use high quality and innovate materials.
Lifespan	The new homes have been designed for long-term stewardship by future occupants, contributing to the community of Rossendale for a very long time.

8.40 It has been shown therefore that the proposals comply with the guidance set out in the National Design Guide.

5 YEAR HOUSING LAND SUPPLY

8.41 The Council cannot currently demonstrate a 5-year housing supply; the Council’s 5 Year Housing Land Supply Report (2020/21 – 2024/25) (March 2021) puts forward four scenarios which suggest the supply is somewhere between 2 and 4.3 years supply. As the Council acknowledges that is unable to demonstrate a 5-year supply (plus buffer) of deliverable dwellings as required by Paragraph 73 of the Framework, the tilted balance test set out in Paragraph 11 of the Framework is engaged – this has been discussed already in this Statement.

ROSSENDALE BOROUGH COUNCIL ALTERATIONS AND EXTENSIONS TO RESIDENTIAL PROPERTIES SPD (2008)

8.42 Pre-application discussions with Officers has highlighted that the Council would require the scheme to have regard to the guidance contained in the SPD, paying special attention to ensuring that minimum separation distances are met. The Design and Access Statement and the accompanying proposed floorplans and Site Layout confirm the following:

- The proposed units have been placed within the site to maintain suitable overlooking distances from adjacent resident accommodation, both existing surrounding properties and those proposed in the scheme.
- New habitable windows have been carefully placed to ensure privacy distances are not compromised.
- Plots 1 and 2 have been designed as single story units (bungalows) to respect the change in levels between the application site and the existing houses on Glenborough Avenue.
- The proposed homes all meet, or exceed the two, three and four bedroom guidelines set out in the Nationally Described Space Standards (NDSS).

EMERGING LOCAL PLAN

8.43 The site has been allocated for housing in draft Policy HS2 under the Reference H32 for 10 dwellings in the emerging Local Plan:

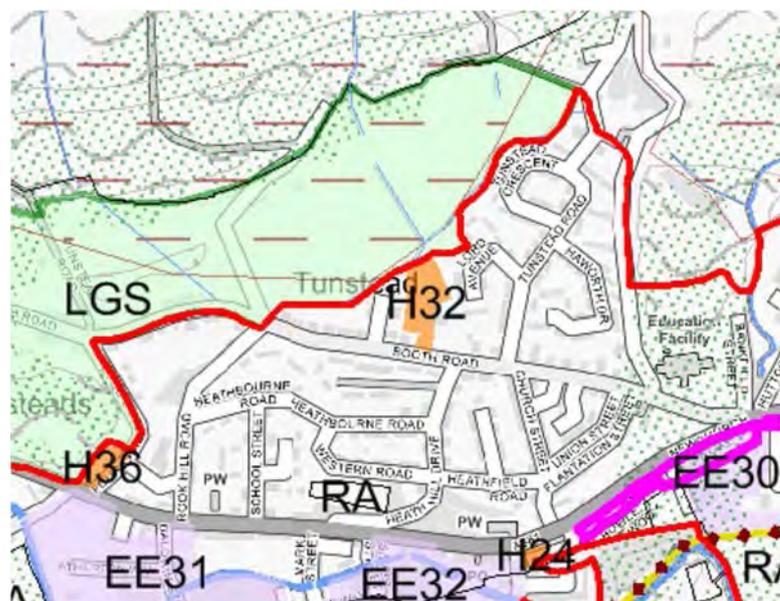




Figure 8.2 Extracts from Submission Policies Maps (Borough-wide and Stacksteads settlement)

- 8.44 The site had been included in the SHLAA 2018 Update (reference **SHLAA1609**) which concluded that the site is available, suitable and achievable for housing with a calculated yield 10 units (based on 30 dwellings per hectare). In representations on behalf of the Applicant we supported the proposed allocation but submitted that the allocation be increased from 10 dwellings to 16 dwellings and indicative layouts were submitted with those Representations demonstrating how the site – which included the Green Belt land – could be brought forward.
- 8.45 The Council submitted its emerging Local Plan to the Planning Inspectorate and Examination Hearings were held in 2019. Following those Hearings the Inspectors required that additional work be undertaken by the Council and before the Local Plan could be progressed. Since then, the Council has undertaken consultation on a number of new Evidence documents and a second tranche of consultation closed recently on 19 March 2021.
- 8.46 Hourigan Connolly has submitted a Representation on behalf of the client to the current consultation demonstrating why there are exceptional circumstances to support a minor amendment to the Green Belt boundary (for the reasons set out previously in this Statement).
- 8.47 With this in mind, the emerging Local Plan has some weight in the determination of the proposed redevelopment.

SUMMARY

- 8.48 The site sits in an accessible, sustainable location and will deliver economic, social and environmental benefits to the local area. It has been demonstrated that there are a number of material considerations which should be noted that weigh in favour of the application proposals and weigh in the overall balance.

9. SUMMARY OF BENEFITS AND CONCLUSIONS

9.1 Hourigan Connolly is instructed by Brother developments Limited (hereafter referred to as “the applicant”) to prepare this Planning Statement in support of a planning application to Rossendale Borough Council (hereafter referred to as “the Council”) relating to land at Heath Hill House, Booth Road, Stacksteads, Bacup.

9.2 The description of development given in the planning application form is:

“Full Planning Application for the Erection of 14no. Residential Dwellings with Associated Car Parking and Hard and Soft Landscaping and including diversion of the public right of way”.

9.3 It has been demonstrated in this Planning Statement that the proposals accord with the relevant provisions of the Development Plan, and where they do not, there is evidenced support to justify a departure from the Development Plan, and that there are other material considerations which support the granting of detailed planning permission.

9.4 Rossendale Borough Council’s stated position is that it cannot currently demonstrate a 5-year housing land supply. Consequently, the tilted balance is engaged in favour of granting planning permission, unless the adverse impacts significantly and demonstrably outweigh the benefits of the proposal. It is set out herein that there are significant benefits associated with the proposed development, and no technical or material considerations that preclude development.

9.5 It has also been shown that there are exceptional circumstances to update the Green Belt boundary to release part of the site from Green Belt, and notwithstanding this, very special circumstances exist to support the delivery of the new dwellings.

9.6 The tilted balance of Paragraph 11 is engaged in this case because there are very special circumstances which outweigh any potential harm. In simple terms, the majority of the application site is proposed for release from the Green Belt and allocation for housing through an emerging plan. The plan has not yet been adopted, but has been the subject of a number of Examination hearings. The very special circumstances relating to this planning application are that, amongst other things, the Council has a substantial housing shortage, and the site fails entirely to contribute to Green Belt purposes.

9.7 The proposals represent a sustainable form of development; the benefits of granting planning permission are considered significant and are not to be ignored.

THE BENEFITS OF THE PROPOSALS

- The development of a sustainably located, vacant site.
- Contribute to the delivering of sustainable development within the next five years.
- The provision of high-quality family housing ensuring a diverse range of housing in Stacksteads and the wider Rossendale Area.
- New employment opportunities and support for existing trades and building suppliers in Rossendale during construction.
- The provision of new homes with genuine prospects at reducing reliance on the private motor vehicle given the proximity of public transport.

9.8 For the reasons set out above we respectfully request on behalf of the applicant that full planning permission be granted.

Appendix 1

Daniel Connolly
Hourigan Connolly
7 Swan Square
15 Swan Street
Manchester
M4 5JJ

Business Directorate
Planning
The Business Centre
Futures Park
Bacup
OL13 0BB

Sent by email to:



This matter is being dealt with by:
Telephone: 01706 238637
Email:



Our reference: 2019/0034PREAPP

Date: 06/09/2019

Dear Daniel,

Reference No: 2019/0034/PREAPP

**Proposal: Pre Application Enquiry: Proposed residential development -
Full application for the erection of 14 dwellings**

Location: Heath Hill, Booth Road, Stacksteads, Bacup

Introduction

Thank you for your enquiry. I write to summarise the key points discussed within the meeting of 18 August 2019 with yourself and your client John Boys who is the site owner. The comments relate to drawing 'Proposed Site Plan' dwg no.11.

All content and advice are as at the date of this letter, and you are asked to note that matters may be subject to change. Please note that a full assessment of the proposal can only be made as part of a planning application. Comments made in this letter are for general guidance only and are made without prejudice to the determination of any future planning application.

Site and context

The enquiry relates to a large portion of the residential curtilage of Heath Hill which extends to around 0.34 hectares. Heath Hill is a vacant detached stone/rendered blockwork/red clay tile bungalow which was last used as a single dwelling. Planning permission has been granted recently for the change of use of the dwelling to a C2 use.

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The site has a gentle slope and contains maintained lawns and trees / shrubs around the perimeter. It is bordered by dwellings on Glenborough Avenue to the west, green belt land to the north, Lord Avenue to the east and Booth Road to the south.

It is located approximately 90 metres north west of the junction of Booth Road and Tunstead Road within the Urban Boundary of Stacksteads. The surrounding area is predominantly residential in character with open greenbelt land to the rear.

Comprising residential curtilage within the Urban Boundary, the site is 'Greenfield' in planning terms. The site is not allocated for any purpose on the Adopted Proposals Map (1995). It is not within a Conservation Area nor does it contain listed buildings or Tree Preservation Orders. The site lies within Flood Zone 1. It is located within the Stacksteads Gorge Local Geodiversity Site.

Proposed development

Advice is sought on the erection of 14no. dwellings as part of a full application, utilising the existing access off Booth Road adjoining 1 Woodland Mount.

Planning history

2019/0198 - Change of use from dwelling (C3) to family residential assessment home (C2). Approved with conditions.

Development Plan Policies

Rossendale Core Strategy DPD (2011)

AVP2	Strategy for Bacup, Stacksteads, Britannia and Weir
Policy 1	General Development Locations and Principles
Policy 2	Meeting Rossendale's Housing Requirement
Policy 3	Distribution of Additional Housing
Policy 4	Affordable Housing
Policy 7	Social infrastructure
Policy 8	Transport
Policy 9	Accessibility
Policy 10	Provision for Employment
Policy 17	Rossendale's Green Infrastructure
Policy 18	Biodiversity and Landscape Conservation
Policy 19	Climate Change and Low & Zero Carbon Sources of Energy
Policy 22	Planning Contributions
Policy 23	Promoting High Quality Design & Spaces
Policy 24	Planning Application Requirements

National

National Planning Policy Framework (2019)

Achieving sustainable development
Decision-making

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- Section 5 Delivering a sufficient supply of homes
- Section 8 Promoting healthy and safe communities
- Section 9 Promoting sustainable transport
- Section 11 Making effective use of land
- Section 12 Achieving well-designed places
- Section 14 Meeting the Challenges of Climate Change, Flooding, etc
- Section 15 Conserving and Enhancing the Natural Environment

Other material considerations

RBC Alterations and Extensions to Residential Properties SPD
 LCC Planning Obligations in Lancashire (2008)
 RBC Open Space & Play Equipment Contributions SPD (2008)
 Emerging Local Plan

The acceptability of the proposal

Principle

The Council cannot currently demonstrate a five-year supply of deliverable housing sites based on Full Objectively Assessed Need (FOAN), and therefore certain Core Strategy policies concerned with the supply of housing cannot be considered up-to-date (in line with paragraph 49 of the Framework). Notwithstanding this, Policy 1 directs new development to the Urban Boundary (the site is within this area) and requires individual planning applications to make the best use of under-used, vacant and derelict land and buildings. Policies 2 and 3 are supportive of housing development within the Urban Boundary, albeit previously developed sites are prioritised.

A Planning Statement / Design and Access Statement should identify the sustainability of the site, giving details of public transport links, proximity to schools, services etc. and whether any are accessible on foot.

A scheme of around 14 dwellings would contribute to reducing the shortfall in housing supply for the Borough over the plan period. Officers consider that residential development is acceptable in principle.

Other material considerations

Emerging Local Plan

The site is proposed to be allocated for housing in the emerging Local Plan (Ref H32) for 10 dwellings. The EiP commences later this month. As such, very limited weight is given to the draft allocation should an application be submitted immediately.

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Layout and design

The Proposed Site Layout illustrates 14no. dwellings (including two bungalows and twelve houses). In creating the detailed design of this development, please have regard to the following:

- In the interests of securing an attractive street scene, car parking spaces should be provided at the sides of dwellings and not to the front.
- Front gardens should be attractively landscaped and should take cues from houses in the immediately locality. In the meeting I pointed out that this includes front low walls or hedges and you indicated that you are likely to have open front gardens. Having looked at this further I would reiterate that open front gardens are not typical of the immediate locality and therefore the use of either low walls or hedges would be required to ensure the development is sympathetic to local character.
- The site's northern boundary adjoins the green belt and as such is particularly sensitive. Any boundary treatment required here shall be in the form of native hedgerows and or stone walls.
- Timber fencing shall be limited to divide plots only, and shall not be sited in locations visible from the highway. Poor quality timber fencing has the potential to cause considerable harm to the appearance of a development and must be avoided.
- Dwellings should aim to meet the nationally described space standard.
- Materials shall fit harmoniously with those in the surrounding area e.g. natural stone, red brick and natural slate roofs.
- Attention to detail such as windows, doors, roof shape. Take cues from the successful examples in the locality.
- Properties on Glenborough Avenue currently directly overlook the site at close proximity. Although there is some perimeter tree cover, this is limited. Careful consideration needs to be given to supplementary planting and separation distances, orientation of houses etc so as to ensure that adequate levels of privacy for existing residents and occupiers of the proposed dwellings is secured.

As discussed, I would encourage you to utilise the pre-app follow up service to seek my views on detailed design matters (elevations, materials, landscaping) in advance of submitting an application, with a view to reducing as many issues as possible. Having such detail will enable me to comment on separation distances also.

Ecology and landscaping

The site is recognised as having ecological value, owing to its location within the Stacksteads Gorge Local Geodiversity Site. As such, any planning application will be assessed against paragraph 175 of the Framework. In the first instance a tree survey and ecological survey will need to be undertaken and the results of which shall inform the proposed development. Trees should be retained and houses constructed around them. Where this is not possible, trees must be compensated for and a net biodiversity gain delivered. Please try to accommodate tree planting in front gardens or explore the provision of street trees, so as to create an attractive place to live that reflects local character and helps to improve biodiversity.

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Highway matters

I would recommend that you utilise Lancashire County Council's Pre-Application Advice Service in relation to highway matters. Doing so will enable detailed discussions relating to parking standards, access, layout of the internal road, adoption etc to take place in advance of the submission of an application, and as such may help to reduce delays during the determination of the application.

You will need to liaise with Lancashire County Council Public Rights of Way regarding the proposed re-direction of the footpath - Ros.Paulson@lancashire.gov.uk.

Planning contributions

A scheme of 14no. dwellings would trigger the following planning contributions:

- Public open space (Policy 22) at £1,366 per dwelling; and
- There may be a requirement for a contribution towards education provision should a need arise from the development (Policy 22). This would normally be confirmed once an application is submitted however I have contacted the Schools Planning Team as part of the pre-application enquiry and I will let you know their response as soon as I receive it.
- Affordable housing (Policy 4). The Council's Strategic Housing Officer has identified the following needs:
 - Social rent: 3 x 2bed; and 1 x 3bed; or
 - 50/50 split with an Affordable home ownership tenure then:
 - 2 x 2bed Social Rent
 - 2 x 3bed Shared Ownership

Please include the following with any application:

- Confirmation of the applicant's agreement to provide the contributions;
- Details of the applicant's solicitor; and
- The applicant's agreement to pay the necessary fees to the Council's Legal Team to draft a Section 106 Agreement.

Community consultation

In accordance with the adopted Statement of Community Involvement (February 2019), consultation with local residents and councillors should take place prior to the submission of an application. For a scheme of this scale I would suggest that this could entail the circulation of leaflets with draft proposals; and / or on-line and / or on-site information on draft proposals. Feedback should be requested within a specified time-scale to allow changes to be made. A Consultation Statement shall be submitted with the planning application, which describes the community consultation that has been undertaken, sets out the comments received and whether / how they have been taken on board.

The site lies in Stacksteads ward and the elected councillors are Cllr Terry Haslam-Jones and Cllr Jackie Oakes.

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Submission requirements

Please have regard to the Council's Validation Checklist (December 2016) which can be viewed at:

http://www.rossendale.gov.uk/news/article/499/planning_validation_checklist

In particular, please ensure the application is accompanied by the following:

- Topographical survey and section drawings
- All the usual drawings for a full application including full landscaping details
- Design and Access Statement
- Energy Statement (see Policy 19 of the Core Strategy)
- Planning Statement
- Consultation Statement (this can be incorporated within the Planning Statement)
- Adoption Statement (showing the extent of roads etc for adoption)
- Full details of the access and road, footways etc into and within the site
- Phase 1 Contamination Report
- Arboricultural Impact Assessment including Tree Survey
- Ecology Survey
- Drainage scheme

Conclusion

To summarise, the proposed residential development on land within the urban boundary in sustainable location is acceptable in principle and the delivery of approximately 14no. dwellings, including bungalows, would contribute to reducing the shortfall in housing supply for the Borough over the plan period. The key considerations for the application will be: ecology and landscaping, residential amenity and appropriate design. I would recommend the use of follow-up pre-application discussions to enable me to comment on the detailed design in advance of the submission of an application.

If you do not submit a planning application straight away please be advised that planning policies / legislation may have changed and I would advise contacting the Planning Section who can advise on the current planning policy situation.

I hope this answers your queries, please do not hesitate to contact me if you require any further assistance.

Yours sincerely

Lauren Ashworth
Principal Planning Officer
Development Management

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15 October 2021

Delivered via email

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

Dear Ms Stora

ROSSENDALE LOCAL PLAN PROPOSED MAIN MODIFICATIONS: CONSULTATION RESPONSE ON BEHALF OF PEEL L&P (REPRESENTOR ID: 5160)

This representation is made on behalf of Peel L&P ("Peel") in respect of the proposed Schedule of Main Modifications to the Rossendale Local Plan Publication Draft (Examination Document SD023) which is currently at Examination.

Peel has engaged in the development and Examination of the Local Plan over a number of years in relation to its land interests in the Borough at Kirkhill Avenue and Moorland Rise (Haslingden); Burnley Road (Edenfield); Blackburn Road (Edenfield) and Haslam Farm (Rawtenstall).

This engagement has included active participation in the Examination through submission of oral and written evidence. Subsequent to the hearings in 2019, Peel has made submissions (dated 19 March 2021, 16 June 2021 and 28 July 2021) in relation to material published by the Council in accordance with the actions set out in Examination Document EL6.001.

The Council's proposed modifications are intended as a combined response to the issues arising during and material published since the hearings in 2019. They are informed by additional evidence provided and reflect the direction provided by the Inspectors, including that set out in the Inspectors' Post Hearing letter (Document EL6.017).

The consultation on the proposed modifications provides the first opportunity to present, through a single submission, Peel's overall considered stance on the additional evidence base and proposed changes to the Local Plan and we welcome the opportunity to set out our position.

Peel has a number of significant concerns regarding the scope and detail of the Local Plan in its modified form which it considers to render the Plan unsound as a whole. Peel has additional specific comments on the revised policy for the former H72 allocation (now H62) 'Land West of Market Street' which are also captured in this representation.

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<p>Summary:</p>
<p>This representation demonstrates that:</p>
<ul style="list-style-type: none"> The proposed reduction in the annual housing requirement to 188 dwellings per annum from 212 dwellings (Policy HS1) per annum is not aligned with the Council’s economic growth aspirations as generally retained in the plan. It will fail to provide the level of housing needed to support the economic growth planned for. It is not justified by reference to the prevailing evidence and is unsound as a result.
<ul style="list-style-type: none"> The Council’s Sustainability Appraisal is deficient in relation to its consideration of the proposed amendment to the housing requirement (Policy HS1) in failing to acknowledge the reduction as a material change. The new annual housing requirement represents a material change which must be benchmarked against reasonable alternatives and assessed through the SA process on that basis to satisfy legal obligations under the Planning and Compulsory Purchase Act 2004 and before any conclusion that this change is sound can be drawn. This includes assessment of the new requirement against a higher annual housing requirement (including the annual requirement previously proposed). The SA is otherwise deficient and not legally compliant
<ul style="list-style-type: none"> The Council’s Sustainability Appraisal is deficient in relation to its consideration of the proposed amendment to the employment land requirement (Policy EM1) in failing to acknowledge the reduction proposed as a material change. The new employment land requirement represents a material change and must be benchmarked against reasonable alternatives and assessed through the SA process on that basis to satisfy legal obligations under the Planning and Compulsory Purchase Act 2004 and before any conclusion that this change is sound can be drawn. This includes assessing the new requirement against a higher annual employment land requirement (including the annual requirement previously proposed). The SA is otherwise deficient and not legally compliant
<ul style="list-style-type: none"> Even based on the inadequate housing requirement, the Local Plan makes insufficient provision for the delivery of its housing needs, failing to identify sufficient land to meet needs and not including any allowance for flexibility in the context of a Borough with challenging market and physical conditions. This places the Local Plan at odds with the NPPF and renders it ineffective. It is unsound as a result.
<ul style="list-style-type: none"> Allocation H62 has not been proven to be developable at this point owing to significant uncertainties around the practical delivery and viability of the highway mitigation which is now acknowledged by Policy H62 as being needed to deliver the allocation. Additional evidence is needed to test mitigation options and demonstrate mitigation is achievable. The need for this is increased by reference to the strategic scale and function of this site in the context of Rossendale, accounting for more than 2 years of its proposed housing requirement. The allocation cannot be found to be sound until further evidence is provided that a scheme to mitigate the highway impacts of the development is achievable
<ul style="list-style-type: none"> The wording of Policy H62 should be amended to be clear that a masterplan for the majority of the site needs to be approved prior to individual applications coming forward, unless the first application relates to the majority of the site such that the masterplan is provided and approved through the application process. This is needed to ensure the policy is effective in bringing the site

forward in a managed and sustainable manner, with infrastructure secured at the appropriate point in the development.

MM06: The housing requirement (included updated evidence base)

MODIFICATION PROPOSED BY RBC: REDUCTION IN ANNUAL HOUSING REQUIREMENT FROM 212 DWELLINGS PER ANNUM TO AN AVERAGE OF 188 DWELLINGS PER ANNUM (POLICY HS1)

The submitted version of the Plan proposed an annual housing requirement of 212 dwellings per annum (dpa). This was in line with the Local Housing Needs (LHN) figure calculated at the time. The Examination Inspectors have noted that over two years have elapsed since the submission of the Plan for examination, such that the LHN figure referenced as the outcome of the standard method in the submitted version of the Plan has now expired (in line with paragraph 008 of the PPG on Housing and Economic Needs Assessment).

The May 2021 Housing Update (EL10.001) set out RBC's re-calculation of the LHN figure for the Borough using the current standard method and the latest data. RBC has identified that the LHN has declined by c.13% to 185 dwellings per annum and it proposes that the housing requirement in the Plan is modified to reflect this figure. The latest Housing Update (EL12.007) confirms the intention to proceed with an annual requirement figure of 185 dwellings, albeit a slightly higher figure of 208 is used for the first two years of the plan. This is reflected in the Main Modifications as proposed. The Council's evidence base does not consider the merits or justification for proceeding with a higher figure as a 'reasonable alternative.'

Peel does not consider this to represent a sound approach, principally as it will render the plan ineffective. The evidence base is also inadequate in not assessing a higher annual requirement as a reasonable alternative.

Assessment of the revised housing requirement through the Sustainability Appraisal

The Sustainability Appraisal of the Proposed Main Modifications (EL12.003) dismisses this change as immaterial such that the sustainability implications of it do not need to be given any further consideration. This is based on the fact that the overall level of housing to be delivered during the plan period is broadly the same as previously proposed due to extending the plan period by 2 years (to 2036). On this matter EL12.003 states, at page B14, that:

'...the proposed modification is a minor increase in housing requirement (3,180 to 3,191) and additional explanatory text as a result of updates to the SHMA and extended Plan period (from 2034–2036), to ensure the policy is consistent with the latest evidence base and national policy. This would not be expected to alter the findings of the SA.'

What this fails to even acknowledge is that the Local Plan will deliver c13% fewer dwellings on an annual basis than previously proposed. This reduction, and its sustainability implications, cannot be covered up by an extended plan period. Evidently an extended plan period means that the plan must deliver 2 additional years' worth of housing. What that housing requirement is on an annual basis is a critical concern of the plan and to suggest a 13% reduction in the proposed annual requirement is not significant enough to trigger an appraisal of this change through the Sustainability Assessment process is a flawed proposition.

The Sustainability Assessment update is not fit for purpose and the Council should be required to revisit this through a proper assessment of the sustainability implications of this change and an assessment of a higher annual requirement as a reasonable alternative. The Plan cannot be said to be justified without this.

Aligning housing and economic growth

With regards to the case for an annual housing requirement of 185 dwellings, it is self-evident that the LHN figure now proposed will not support RBC's economic growth objectives.

The PPG makes clear that the LHN figure is only the minimum "starting point"¹ in determining the number of homes needed in an area. Peel strongly dispute RBC's claim that this lower figure is reflective of the Borough's full housing need or that it represents a sound housing requirement. Such a statement clearly contradicts the evidence base published alongside the Plan and even RBC's own comments during the examination hearings on this topic, during which RBC clearly stated that a higher level of housing provision is needed in Rossendale to realise the strategic economic objectives of the draft Local Plan.

In this regard, Peel's representations to the consultation on the "second tranche" of documents dated 19 March 2021 highlighted RBC's representatives stating – at the hearing session in Autumn 2019 – that an increased requirement of at least 236 dpa would be appropriate to align with the Plan's policies on employment land. The Examination Inspectors' acknowledged this concession in a letter to Peel dated 4th September 2020, which confirms as follows in respect of the housing requirement: *"this was the subject of extensive discussion at the hearing session, and the Council did suggest at one point that a higher housing figure would be appropriate."*

At the very least this concession must mean that a higher housing requirement represents a 'reasonable alternative' and one which should be subject to consideration through an options appraisal and Sustainability Appraisal process. To ignore this puts the modified plan in conflict with the 'justified' test of soundness.

RBC's proposal to substantially reduce the housing requirement contrasts with its intention to maintain an employment land requirement of 27 ha in the Plan, albeit delivered over additional years of the plan period with a commensurate annual reduction in employment development resulting from this. Whilst proposing an annual reduction in employment development, on which we comment later, there remains a misalignment between the economic ambition of the Local Plan and the level of housing development needed to support this in a sustainable manner. In effect, RBC is seeking to broadly retain its ambitious level of employment land provision and job growth, whilst seeking to further reduce the scale of new homes being delivered.

The inconsistency and imbalance of this an approach is clearly captured in the note provided by Lichfields and appended to the Employment Land Update (Document EL10.002), which confirms at paragraph 4.4 that:

"If the Council were to pursue a labour-supply led figure of 185 dpa, this might be expected to require an employment land figure of around 14 hectares – a significant reduction from the 27 hectares previously proposed in the emerging Local Plan"

RBC's own evidence therefore makes clear that a housing requirement in line with the minimum "starting point" LHN figure of 185 dpa will support half of the amount of employment land proposed.

RBC notes at paragraph 3.1 of the Housing Update May 2021 (EL10.001) that the PPG makes clear that there are circumstances where it may be appropriate to plan for a higher level of housing need than that indicated by the standard method¹ (e.g. growth strategies, strategic infrastructure improvements, taking on unmet need from neighbouring authorities). The August 2021 Housing Update (EL12.007) removes all such text and simply states that 185 dwellings per annum is the output of the standard methodology and therefore will be pursued.

RBC has incorrectly interpreted the circumstances referred to above as a 'closed list' and seeks to make the case within the May 2021 Housing Update (EL10.001) that there are no such circumstances in Rossendale which justify a

¹ Planning Practice Guidance, paragraph 10, Reference ID 2a-010-20201216

housing requirement which exceeds the baseline LHN. However, RBC's justification for broadly retaining the higher employment land requirement – set out in the accompanying Employment Land Update (May 2021 Document EL10.002) – actually serves to contradict and undermine this; in particular, RBC justifies its retention of the higher 27ha employment land requirement in order to satisfy "...pent-up demand..." stating that:

"The proposed allocations in the west of the Borough make up the Rossendale Valley Growth Corridor, a key strategic infrastructure programme to improve road and accessibility and open up employment sites"
(p5)

This clearly aligns with the statement in the PPG that growth strategies and strategic infrastructure improvements are circumstances which may require a level of housing delivery above the minimum starting point figure calculated via the standard method. Moreover, the Employment Land Update goes on to confirm that:

"The Rossendale Valley Growth Corridor is embedded in the Council's Corporate Plan, the 2018 Economic Development Strategy for Rossendale and the associated 2021 Business Recovery Plan, developed as a response to the pandemic"

Finally, in this context it goes as far as stating that:

"This initiative is a crucial part of the levelling up agenda and supports the ambitions of the Pennine Lancashire Growth and Prosperity Plan 2016-2032, the delivery of the Lancashire Industrial Strategy, Greater Lancashire Plan and the Lancashire Strategic Development and Infrastructure Plan"

It is therefore evident that the 27ha employment land requirement and associated job growth is significantly higher than that which has been delivered in the recent past, but is considered by RBC to be a critical component of its own and other strategies for growth at the local and sub-regional level. Accepting the above as a deliverable growth strategy, it is reasonable to assume that the purpose of the investment – noting its reference to the national agenda – is to support above-trend growth in the economy of the area. This is considered to be ever more critical in the context of the economic decline experienced over the last 12 months as a result of the Covid-19 pandemic.

Significantly, however, the analysis presented by Lichfields (appended to the Employment Land Update EL10.002) indicates that there is a reasonable prospect that a housing requirement of only 185 dpa (and 208 dpa over the first two years) will facilitate a change in the area's demography that would support only 471 jobs over the extended plan period from 2019 to 2036².

This equates to an average of only 28 new jobs each year. The apparent acceptance of such a modest level of job growth does not stand up to scrutiny in the context of RBC's stated economic ambitions, and it is wholly unjustified given that the same evidence recognises that substantially more jobs, in the order of 1,400, could be expected under even a baseline forecast³.

Lichfields' evidence further shows that supporting this baseline forecast (1,400 jobs) would require more pronounced growth in the population and labour-force, in turn generating a higher need for between 242 and 268 dpa⁴. This broadly aligns with the analysis previously submitted to the examination by Lichfields in EL4.004, which indicated that around 236 dpa would be needed to support the 1,100 new jobs that RBC then expected to be generated through its proposed supply of employment land. It was this level of housing need that was apparently

² Table 2.1 of Appendix 1 to EL10.002

³ Table 5 of Appendix 1 to EL10.002

⁴ Table 5.1 of EL10.002

accepted by RBC as being more appropriate and aligned with its economic strategy at the examination hearing in 2019, as referenced earlier.

The comparison to adjacent areas is inappropriate

Within the May 2021 Housing Update (EL10.001) RBC seeks to describe its approach (i.e. adopting a low housing requirement in line with its minimum LHN figure despite an economic strategy which targets growth significant above past-trends) as being consistent with that taken by other emerging Local Plans. Specifically, it suggests at paragraph 4.10 that the Greater Manchester Spatial Framework (GMSF) (now referred to as Places for Everyone and excluding the Borough of Stockport) is following a similar methodology. No weight can be given to any such alignment, given that Places for Everyone has not been independently examined, is the subject of outstanding objections in respect of these very matters (i.e. the imbalance between the scale of housing and employment provision).

In looking for precedent, it would be more relevant for RBC to acknowledge that there are, in accordance with Government expectations, many examples of Local Plans – particularly in the North – where a higher housing requirement figure has been evidentially justified. This includes Plans that are currently at examination, such as St Helens and Halton, both of which seek to meet levels of housing need that are respectively 15% and 48% higher than the minimum LHN figure implied by the standard method. In both cases, the higher level of need is largely justified on the basis of supporting job growth arising from their planned provision of employment land.

The LHN figure will not deliver the affordable homes required

Peel fundamentally disagrees with RBC's assertion that a lower requirement figure can be justified where it will still fail, just by a greater amount, to meet the significant and acute need to deliver affordable housing. In this regard it is noted that RBC continues to reference the need for between 102 and 170 affordable homes per annum⁵, calculated in the 2019 SHMA Update. It is understood to be a matter of fact that during the course of the examination such a level of need has not been matched by supply. Indeed RBC's latest Housing Delivery Test Action Plan, published in February 2020, confirms at paragraph 6.18 that there has actually been "*...a reduction in affordable housing delivery...*" in recent years where it is equally noted that between 2010 and 2018 only 256 affordable homes were delivered (32 per annum)⁶. Where the affordability adjustment applied as part of the standard method does account for overall undersupply, the same is not true of the more immediate need for affordable housing where it is necessary to reset and recalculate the need to demonstrate the implications of historic under-provision. As a result, where supply has reduced and fallen short of need over the last two years a further shortfall will have arisen to which the absence of a positive plan-led approach has contributed.

Additional sources of land supply are available

Finally, in its attempt to justify the reduction of the housing requirement – in the context of an evidence base which is unsupportive of such an approach as explained above – RBC makes reference to the "*...physical constraints of the Borough*"... (paragraph 3.4 of EL10.001). The PPG is explicit that it is necessary for RBC to first calculate need and then assess factors such as these in deriving a requirement. RBC has failed to adequately make this distinction in its attempt to use perceived constraints as justification for not exploring whether a higher need for housing exists. The calculation of need is an independent exercise and none one which should be 'wrapped up' into an assessment of the practical implications of delivering a higher number than the LHN. There may be circumstances where planning for a reduced requirement is appropriate, on balance, but in the context of land being promoted by Peel as an experienced developer and willing land owner, no such evidence is before the Examination.

⁵ Paragraph 5.1 (5) of EL10.001

⁶ EL4.006

<p>Summary: The Plan must proceed with a housing requirement figure which is aligned with and complements its employment growth proposals in order that housing needs are met and so for the Plan to be effective, justified and consistent with national planning policy</p>
<p>Summary: The SA Update must assess the sustainability implications of reducing the annual housing requirement by some 13% and must test this against a higher annual housing requirement as a reasonable alternative for this to legally compliant and for the plan to be found sound</p>

MM026 Employment Land Requirement

MODIFICATION PROPOSED BY RBC: REDUCTION IN ANNUAL EMPLOYMENT LAND REQUIREMENT FROM 1.8 HA PER ANNUM TO 1.6 HA PER ANNUM (POLICY EMP1)

Strategic Policy EMP1 confirms the requirement to deliver 27 ha of employment land during the plan period to 2036. The overall requirement is unchanged but, on an annual basis, this will deliver some 11% less employment development owing to the extension of the plan period to 2036.

Similar to the proposal regarding the housing requirement, the Sustainability Appraisal update seeks to dismiss this as insignificant insofar as the headline figure reads the same. Again however, it is the Plan’s remit to ensure sufficient development on an annual basis. The Council has provided no justification for an annual reduction of some 11% in the employment development requirement and the Sustainability Appraisal update fails to even acknowledge that a reduction, in real terms, is proposed.

This change to the Plan has not been justified. It is underpinned by a deficient evidence base and has not subject to an assessment against reasonable alternatives, which would include a retention of the previously proposed annual requirement figure of some 1.8 ha, compared to 1.6 ha as now proposed.

<p>Summary: The Plan must proceed on the basis of an annual employment requirement of 1.8 ha rather than 1.6 ha in order to be found sound</p>
<p>Summary: The SA Update must assess the sustainability implications of reducing the annual employment requirement by some 11% and must test this against a higher annual employment development requirement as a reasonable alternative for this to legally compliant and for the plan to be found sound</p>

MM08: Housing Land Supply and extent of allocations

MODIFICATION PROPOSED BY RBC: NONE MATERIAL

The Housing Updates (EL10.001 and EL12.007) include a revised housing land supply position which reflects its proposal to reduce the overall housing requirement to 185 dpa. Peel comments on this land supply as follows:

- The updated housing land supply information confirms there has been a significant shortfall in completions for years 2019/20 and 2020/21, where only 64% of the requirement was met (shortfall of 114 dwellings for 2019/20 and a shortfall of 131 dwellings for 2020/21) (EL12.007). RBC are correct that a 20% buffer is therefore to be applied to the requirement and shortfall, and the shortfall reiterates the need to identify new sources of deliverable housing land.

- Peel’s statements to the examination hearings (specifically in respect of Matters 2 and 19) identified the need to include a ‘lapse rate’ in the supply, typically between 10% and 20%⁷. RBC has not applied a lapse rate, with the effect being that the supply is over-estimated by c.10-20%. It will therefore fall significantly short of even the low requirement proposed by RBC.
- The updated housing land supply information makes clear that there is a significant over-provision of new housing sites within the eastern parts of the Borough, most notably at Bacup and Whitworth, at the expense of stronger market locations such as Rawtenstall which are proven to be the most sustainable locations to accommodate growth. RBC’s own evidence (in form of the 2016 Keppie Massie Viability Study) indicates that the spatial distribution of allocations as proposed could undermine the delivery of the Local Plan’s housing requirements and will fail to optimise the level of affordable housing provided during the plan period.
- RBC’s viability evidence demonstrates that development viability in Bacup is marginal. As such, affordable housing is not viable in Bacup in contrast with stronger market areas in the west of Borough. The spatial strategy advanced therefore undermines the achievability of the sites within the Plan in placing an overreliance on development being brought forward in locations where viability is marginal. RBC has therefore failed to identify enough sites which are suitable, available and achievable to meet even the reduced requirement as calculated by the standard method.
- Peel’s written statements to the examination in respect of Matters 9, 10, 11, 12, 13 and 14 identify several sites which are not considered to be deliverable or developable due to unresolved physical constraints, 8 DCLG Presentations to the HBF Planning Conference (September 2015) 7 land ownership or viability issues (not exhaustive); for brevity we have not updated these site assessments but consider many of them to still be relevant in the absence of further evidence from RBC.

Peel therefore considers that the updated housing land supply information set out in the Housing Update does not address concerns raised previously, that the supply is over-reliant on smaller sites in weaker market areas which will not deliver affordable homes and in conflict with the proposed spatial strategy.

This is particularly the case given that RBC’s identified reduced supply amounts to 26 dwellings (EL12.007) less than the minimum requirement housing requirement proposed, even before the effects of a lapse rate and other issues raised by Peel above and in previous statements are taken into account. This is wholly unacceptable and unsustainable, particularly given that there has been a c.40% shortfall in housing delivery over the last two years since the examination hearings in Autumn 2019. In effect, the identified supply will be wholly ineffective at delivering the new homes that the Borough’s communities urgently need. Critical ambiguities in relation to the Spatial Strategy, housing land supply and the housing requirement present significant and fundamental concerns regarding the soundness of the Local Plan at this late stage of the adoption process. Without a transparent approach to the identification of the housing requirement, the Local Plan cannot be relied upon or found sound.

Summary: The Plan must identify an additional supply of land to ensure its housing requirements can be met and so to achieve consistency with NPPF and for the plan to satisfy the effective test of soundness

⁷ DCLG Presentations to the HBF Planning Conference (September 2015)

MM09: Policy H62 (formally H72/HS3): Land west of Market Street, Edenfield

MODIFICATION PROPOSED BY RBC: SUBSTANTIAL REWORDING OF THE POLICY IN RELATION TO HIGHWAY CONSIDERATIONS

Former Policies HS3 and H72 have been deleted and amalgamated into a new Policy (H62) relating to the allocation of the above site. The substance of the allocation is unchanged but the new wording introduces a number of changes to how the site is to be brought forward and raises a number of issues regarding its delivery.

Highways impact and mitigation

The new wording now outlines the requirement for the submission of a Transport Assessment to demonstrate that the site can be safely and suitably accessed by all users. The new policy explicitly requires this to, *inter alia*, deal with the requirement for suitable mitigation measures in respect of the highway capacity of Market Street. It identifies that improvements will be needed to the Market Street Corridor from Blackburn Road to the mini-roundabout near Rawstron Arms will be needed.

The inclusion of explicit reference to the need for highway mitigation is borne out of highways evidence before the Examination which considers the impact of this allocation on the highway network. The additional wording was identified as being necessary through the Hearing sessions and it was an agreed action that Lancashire County Council provide this wording for the policy (Document EL6.001).

This is a material change to the policy, arising from a scrutiny of the transport evidence. It is appropriate that this detail is included in the policy, to set a clear expectation around mitigation necessary to accommodate the development. However, this does bring into question how and whether the site can come forward and reduces certainty of its developability over the plan period.

The Local Plan is reliant on this site to deliver over 2 years of its housing requirement. The impact of this site not coming forward would be fatal to the plan and the achievement of the outcomes it seeks, including the provision of sufficient housing to meet the Borough's needs. It is strategic in scale and significance to the Borough.

It is in this context that Peel raises concerns about the scope of mitigation needed to bring the site forward and indeed whether that mitigation can be achieved. There is presently a lack of evidence available that it can.

Given the above position, it is appropriate and necessary for soundness of the Local Plan that additional certainty is sought around the form of mitigation needed to accommodate the development and whether that is deliverable. Indeed, the Council has taken this more robust approach with respect to school provision, having identified a means by which additional capacity can be provided through considering the ability to extend existing schools in the locality (Edenfield CE or Stubbins Primary School) and further has considered the Green Belt context of these schools to determine that Green Belt harm would be at a level which can be tolerated in the context of a Very Special Circumstances case.

The very same principles should apply to other forms of mitigation. At present, there is an absence of any evidence around the form of highway mitigation needed and whether this can be achieved, beyond identifying the junction/s that are expected to require enhancements.

The allocation is large for the size of the settlement and its existing infrastructure has evidently not been developed to accommodate an additional 400 homes. Whilst providing a critical mass of dwellings in one location provides the ability to fund upgrades to local infrastructure, this is starting from a base position of such infrastructure not being present. This compares with larger settlements such as Rawtenstall as the largest service centre in the Borough.

To assist the Examination, Peel has commissioned its highways advisors, SCP, to consider this matter further. A technical note which assesses the impact of the development on the highway network, including drawing out the key conclusions from the existing evidence before the Examination, is provided at Appendix 1. This first presents a review of the evidence and concludes that this represents a mixed picture as to the highway impacts of the proposal and the ability of the existing network, particularly the Market Street/Rochdale Road/Bury Road mini-roundabout, to accommodate the development based on future year capacity predictions. The position reported is, at best, marginal.

SCP have gone on to undertake their own assessment of the network based on up to date traffic survey data with these showing reduced flows compared to surveys previously undertaken by SCP and submitted as part of Peel's representations. Background grow, the traffic generated by the proposed development and that generated by other committed developments, including other Local Plan allocations, is added to this to predict the capacity position in 2028 and 2033. The assessment concludes that the above roundabout would be operating over capacity with the proposed development being a significant contributor to this. Unmitigated it is concluded that the development would have a severe impact on the highway network which, in accordance with paragraph 111 of the NPPF, would justify the development not proceeding.

The assessment goes onto to consider mitigation options but notes that these are severely limited by third party land ownership, the physical constraints of the road network and it being limited in width and depth and contained by residential and other development and the knock on effects of enhancements to the junction which would conflict with access to private drives, a bus stop and heavily utilised parking bays used by residential properties which do not have access to off street parking.

Implications

Based on the evidence before the Examination, it has been concluded that the highway network surrounding allocation H62 is constrained and that mitigation is required to ensure this site come forward without causing significant implications to the network. This is reflected in the revised policy wording. It is however not clear at this stage that there has been any consideration given to a possible a highway mitigation solution and at this point it remains unclear as to whether such mitigation is in fact achievable. The material change to the policy in identifying the need for mitigation means there is a consequential requirement for the Council to consider whether this is achievable in order that the allocation can be found to be sound.

The failure to commission further work to explore mitigation options prior to drawing a conclusion that the allocation is developable represents a significant deficiency in the plan making process. The developable test must be passed for the allocation to be found to be sound and, as noted above, this is all the more important in the context of a site of this scale and significance to the Local Plan. At this point in time, this is unproven.

A further concern is that the allocation will be burdened with the costs to deliver any network mitigation, the scale and scope of which remains unknown. Any abnormal costs, such as highway mitigation, will need to be considered when assessing the viability of this allocation and the consequential impacts this may have other obligations sought by the Council. The success of the Local Plan is wholly dependent on sites, such as H62, coming forward and in the absence of any detailed mitigation strategy, it remains unclear as to whether this site is developable.

At this stage, the allocation is unsound. The additional wording included in the draft policy raises questions around the practical delivery of the scheme in directing that a specific part of the highway network is impacted to the level whereby a bespoke mitigation scheme is needed. It is right that the policy seeks to deal with this upfront, and this is reinforced by the evidence in the SCP note, but in doing so this comes with a requirement that supporting evidence is provided to demonstrate that this is deliverable and that the site can fund this without compromising its viability. That evidence is not before the Examination. It should be commissioned by the Council and subject to consultation before the Local Plan progresses further.

Summary: The allocation west of Market Street, Edenfield (Policy H62) is not sound in its present form. There are significant uncertainties as to whether the highway mitigation needed to accommodate the development can be provided. The site is yet to be proven to be developable.

An appraisal of mitigation options and practical delivery of these must be undertaken by the Council and made available for consultation.

MODIFICATION PROPOSED BY RBC: FURTHER EXPLANATION OF MASTERPLANNING REQUIREMENTS

The policy has been expanded to confirm that the masterplanning process which is required for the entire site should include an agreed programme of implementation and phasing.

Given the site's scale and infrastructure requirements associated with it, it is important that a comprehensive approach to the site is taken, particularly so in relation to plots to the south of Church Lane with land to the north being physical distinct from this and capable of being accessed and delivered independently.

Peel agrees with the additional wording but considers that further clarification should be sought as to the scope and timing of the masterplanning step and when this is needed relative to the submission of planning applications. The Council will need to be satisfied that there is a joined up approach across the piece and therefore it is appropriate for the policy to require a masterplan for the whole area to be approved prior to the submission of applications on individual parcels. The only exception to this would be if the first application covered the full site area, in which case the masterplan approval process can take place through the Council's assessment of that application. This is important due to the likely infrastructure requirements which need to be identified, planned for and secured as part of the phased delivery of the site.

Summary: Point 1 of Policy H62 should be amended to read:

A masterplan for the comprehensive development of the site has first been submitted to and approved by the Council, unless the first planning application for the site seeks planning permission for the development of the full site area and in doing so presents a masterplan for the full extent of the allocation for approval such that infrastructure requirements can be adequately identified and secured as part of a phased delivery of the development

I trust these comments are helping in considering the soundness and legal compliance of the Local Plan further.

Yours sincerely



Andrew Bickerdike
Director



Enc.

Site Allocation Review

Land off Blackburn Road, Edenfield, Rossendale

GW/210421/TN02 - 14 October 2021

1.0 INTRODUCTION

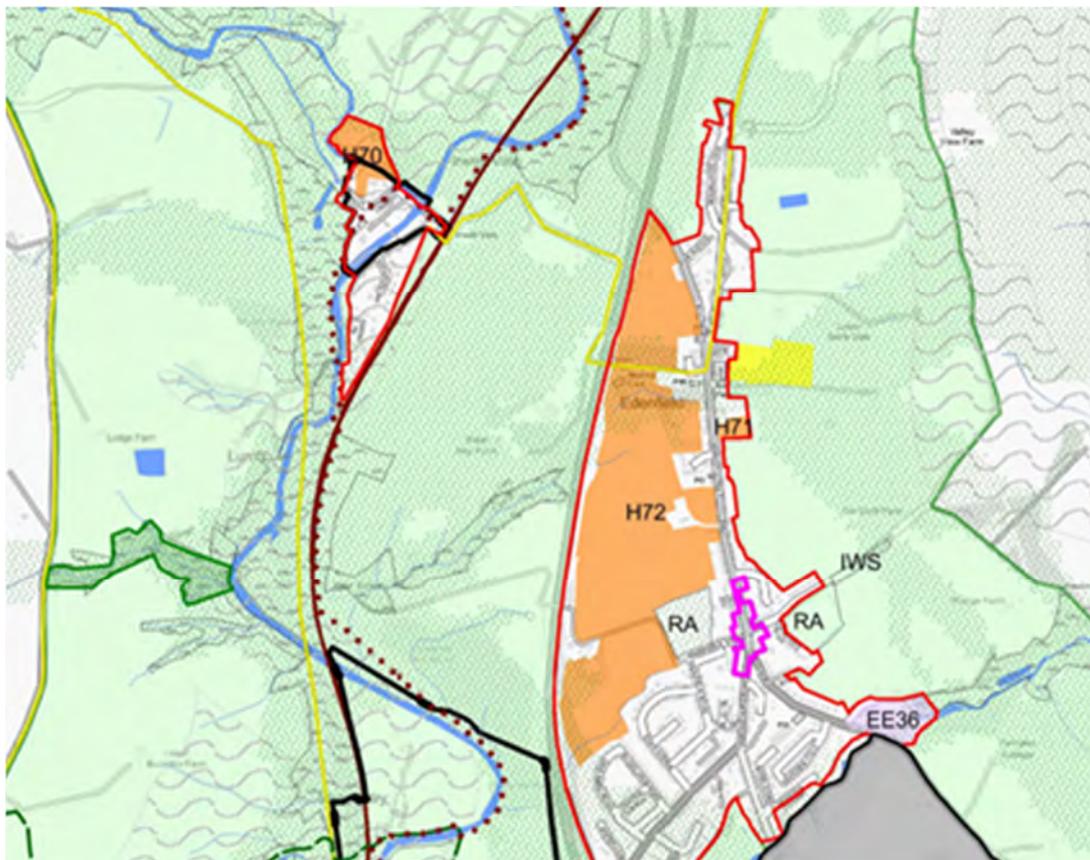
1. SCP have been instructed by Peel Holdings (Land and Property) Ltd to investigate the allocation of land off Blackburn Road for residential purposes in the Rossendale Local Plan, as part of the Local Plan Main Modifications Consultation.
2. The Local Plan Main Modifications Consultation shows the site reference amended from H72 to H62, it goes on to state;

‘Development for approximately 400 houses would be supported provided that:3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. In particular:
 - i. *safe vehicular access points to the site are achieved from the field adjacent to no. 5 Blackburn Road and from the field opposite nos. 88 – 116 Market Street. Full details of access, including the number of access points, will be determined through the Transport Assessment work and agreed with the Local Highway Authority;*
 - ii. *agree suitable mitigation measures in respect of the capacity of Market Street to accommodate additional traffic. Improvements will be needed to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rawstron Arms. Measures to assist pedestrian and vulnerable road users will be required.’*
3. This technical note has been prepared to review the documents submitted throughout the allocation process with a particular focus on the capacity of the local highway network to accommodate additional traffic and the potential mitigation measures available.
4. As part of the current Local Plan Main Modifications consultation, the highways related background papers have been reviewed and further assessments made to establish whether the full site allocation is deliverable in traffic and transport terms.
5. A range of documents have been reviewed as part of this investigation; they include;

- Rossendale Local Plan, Highway Capacity Study, Mott MacDonald (October 2018)
- Rossendale Local Plan, EIP Hearing Statement, Hive Land & Planning for Anwyl Homes (August 2019)
- Rossendale Local Plan, EIP Hearing Statement (including considerations for Highways Matters, Croft (October 2018), Pegasus Planning for Taylor Wimpey (August 2019)
- Rossendale Local Plan, EIP Statement, Troy Planning for Edenfield Community Neighbourhood Forum (August 2019)
- Rossendale Borough Council, Infrastructure Delivery Plan, March 2019 update
- Local Plan Examination: Schedule Of Actions (November 2019)

6. The site allocation is set out in Figure 1 below.

Figure 1- Emerging Local Plan site allocation H62



Source: Emerging Local Plan 2019

- The wider site allocation is made up of three parcels of land which were each supported by their own representation. These include: land west of Market Street, land off Exchange Street and land to the west of Blackburn Road. Previously, each of the land parcels would be served by separate vehicular access points however the Local Plan Modifications report suggest that there would be a single access to the north of 5 Blackburn Road and opposite 88-116 Market Street. A illustrative masterplan was previously prepared and is shown in Figure 2 below.

Figure 2- Illustrative masterplan



- According to the representations, the Market Street site could accommodate up to 273 dwellings and the land off Exchange Street could accommodate up to 100 dwellings. The Blackburn Road site is for up to 65 dwellings on a stand-alone site with a separate vehicle access onto Blackburn Road. The site is separated from the remainder of the H62 site by Church Lane, which runs east/west to the south of the site. However, the site allocation H62 is for a total of 400 dwellings.

2.0 REVIEW OF TECHNICAL REPORTS FOR SITE REPRESENTATIONS

1. Two reports have been previously been prepared which investigate the capacity of the highway network as a result of the site allocations; one by Croft which specifically addresses the impact of the housing allocation H62 and the other by Mott MacDonald which addresses all of the site allocations including a further three sites in Edenfield capable of accommodating a further 101 dwellings: H70, H71 and H73.
2. Both reports use the same baseline traffic flows taken from surveys undertaken in 2017. Croft have accounted for background traffic growth by factoring up using Tempro data. This gives a growth of 7.4% in the AM peak and 6.4% in the PM peak, over a period of 17 years. This doesn't take into account committed developments or all of the other site allocations, which is standard practice.
3. The trip rates have been brought up to date using the latest version of TRICS 7.8.2 which are set out below in Table 1 and at [Appendix 1](#).

Table 1- Trip generation

		SCP		
		IN	OUT	Total
AM	Trip Rate	0.126	0.388	0.514
	Trip Generation	50	155	205
PM	Trip Rate	0.348	0.157	0.505
	Trip Generation	139	63	202

4. Taking into account differing traffic generation figures and an underestimate in the background traffic growth, the subsequent capacity assessment findings must be considered overly optimistic. The Croft report concluded *'the Market Street/Rochdale Road/Bury Road mini-roundabout is predicted to operate within capacity at 2024 and 2034 base years and would continue to operate within capacity following the addition of traffic associated with the draft allocation sites'*.
5. It must be noted that the general accepted RFC where a junction is operating at capacity is 0.85. On this basis, in the Croft report in 2024 with allocation H62, in the morning peak Rochdale Road would experience an RFC of 0.93 with queues of 11 vehicles, up from a queue of 7 without development. In the PM peak Bury Road would experience an RFC of 0.93 and queues of 11, up

from 5 without development. The junction capacity reduces even further in 2034 and this is without other local land allocations or committed developments included.

6. The Mott MacDonald report, produced at the same time using the same background flows, incorporates higher background traffic growth as well as flows from other allocations and committed developments. As such the outputs are different to the Croft results due to the variations in background flows, robust traffic generation figures and a different approach to traffic distribution. The report concludes that the roundabout could accommodate the predicted development trips up to an opening year of 2024, beyond which mitigation measures would be required.
7. Mott MacDonald have recommended that the existing zebra crossing to the north is formalised to create a signalised crossing point. This would introduce gaps in southbound traffic to assist with the operation of the roundabout. It is not clear what effect the location of this crossing would have on the junction of Exchange Street/Market Street.
8. The report goes on to assess exactly how many vehicle movements could be added to the junction before it was deemed over capacity. These movements are set out below. *'At 2034 the following additional demand in Table 61 can be accommodated at the junction, by turn movement. This analysis has been undertaken using the proposed controlled crossing version of the model'.*

Table 2- Extract from Highway Capacity Study 'Table 61. Junction 11 Rochdale Road / Market Street Edenfield Demand Accommodation'

Table 61. Junction 11 Rochdale Road / Market Street Edenfield Demand Accommodation

Lane Description to from	2034 AM LP			2034 PM LP		
	Bury Rd North	Rochdale Rd	Bury Rd South	Bury Rd North	Rochdale Rd	Bury Rd South
Bury Rd North	N/A	28	105	N/A	33	75
Rochdale Rd	48	N/A	2*	20	N/A	7*
Bury Rd South	99	7*	N/A	74	4*	N/A

* Unadjusted values

Source: Mott MacDonald

9. The report concludes that *'Any further mitigation solutions considered valid for this junction should only be determined in consultation with LCC, given the extremely land locked nature of the junction and it's proximity to a number of residential units'*.
10. It is clear that there is uncertainty over the level of additional traffic the roundabout can accommodate and the form of any mitigation which could take place due to physical constraints in the area. The adopted highway boundary runs to the back of footway in the vicinity of the mini-roundabout and beyond that there is multiple third-party ownership surrounding the mini-roundabout. There is also some direct vehicle access into commercial and residential properties close to the roundabout which also need to be taken into consideration in any improvements.

3.0 METHODOLOGY

Traffic Surveys

1. To enable an assessment to be made as to the suitability of the local highway network to accommodate the development traffic from the H62 allocation, new traffic surveys have been undertaken. These were carried out at the junction of Bury Road/ A680 Rochdale Road/ Market Street.
2. The surveys were carried out between the hours of 7am-10am and 3.30pm-6.30pm on Wednesday 15th September 2021.
3. All of the survey data is included in **Appendix 2**. The traffic flow figures can be found in **Appendix 3**.
4. The previously recorded data at the mini-roundabout junction has been compared to the LCC 2017 survey and the SCP 2018 survey. In the AM peak flows are broadly consistent with the SCP 2018 survey, with the largest difference being a drop of 79 vehicles on Rochdale Road left turn. Overall the latest flows show a reduction of 93 vehicles.
5. In the PM hour there is a more marked reduction in traffic flows across the arms, in particular on Bury Road Right with 227 less vehicles. In total, the 2021 flows are 239 vehicles lower than the SCP survey in 2018.

Table 3- Comparison of traffic flow figures

AM Peak Hour	LCC Survey 2017	SCP Survey 2018	SCP Survey 2021	Difference in Flows
Bury Road Ahead	144	124	135	11
Bury Road Right	271	250	264	14
Market Street Ahead	365	297	228	-69
Market Street Left	241	188	137	-51
Rochdale Road Left	382	338	259	-79
Rochdale Road Right	219	178	259	81
TOTAL	1622	1375	1282	-93

PM Peak Hour	LCC Survey 2017	SCP Survey 2018	SCP Survey 2021	Difference in Flows
Bury Road Ahead	350	217	252	35
Bury Road Right	310	519	292	-227
Market Street Ahead	172	225	184	-41
Market Street Left	137	162	101	-61
Rochdale Road Left	261	215	224	9
Rochdale Road Right	299	189	235	46
TOTAL	1529	1527	1288	-239

- 6. Given that this is the most recently available data, the 2021 survey flows have been used for assessment purposes.

Assessment Years

- 7. The assessment years have been pushed forwards to an opening year of 2028 and a future year of 2033. Tempro factors have been used to calculate the increase in traffic over the period 2021 to 2028 and 2021 to 2033. These can be seen below and base flows for both years shown in Traffic Figures 8.2 and 8.3.

Table 4- Tempro Factors

	2021-2028	2021-2033
AM PEAK	1.04	1.07
PM PEAK	1.04	1.07

Trip Generation

- 8. Traffic generation for 400 dwellings has been calculated using the SCP trip rates as set out in Table 1.

Traffic distribution

- 9. Traffic distribution has been calculated based on background traffic flow distribution along Market Street. The Traffic distribution can be found in Figures 8.4, 8.5, & 8.6.
- 10. The assigned traffic can be found in Figure 8.7.

Committed development

- 11. Predicted traffic flows from the other allocated sites within the Rossendale Local Plan have been obtained from Appendix D of Rossendale Local Plan, Highway Capacity Study, Mott MacDonald (October 2018).
- 12. These flows include the roundabout junction of Bury Road/ A680 Rochdale Road/ Market Street. To ensure the development flows from site H62 are not double counted, these have been removed from the allocated site traffic flows. These can be found in Figure 8.8.

4.0 CAPACITY ASSESSMENTS

Bury Road/ A680 Rochdale Road/ Market Street.

1. The existing mini-roundabout has been tested to establish how the allocated site traffic and development traffic from site H62 will affect the operation of the junction. The junction has been assessed using ARCADY and the results can be seen below with the outputs in **Appendix 4**:

Table 5- Bury Rd/Rochdale Rd/Market St 2028

	AM		PM	
	Queue (PCU)	RFC	Queue (PCU)	RFC
Base 2028 + allocated site traffic				
Market Street	2	0.68	2	0.67
Rochdale Road	74	1.25	16	1.00
Bury Road	7	0.88	34	1.08
Base 2028 + allocated site traffic + development				
Market Street	3	0.77	2	0.67
Rochdale Road	102	1.35	36	1.10
Bury Road	7	0.89	67	1.16

2. The capacity has also been tested for a future year of 2033. The results are shown below:

Table 6- Bury Rd/Rochdale Rd/Market St 2033

	AM		PM	
	Queue (PCU)	RFC	Queue (PCU)	RFC
Base 2033 + allocated sites				
Market Street	2	0.70	2	0.68
Rochdale Road	86	1.29	21	1.03
Bury Road	8	0.90	42	1.09
Base 2033 + allocated site traffic + development				
Market Street	4	0.79	2	0.69
Rochdale Road	120	1.40	45	1.14
Bury Road	8	0.90	77	1.19

3. Whilst the junction would be operating significantly over capacity in 2028 and 2033 base scenarios anyway, with the addition of the development traffic every additional vehicle joins the back of the queue. Queues increase from 86 to 120 on Rochdale Road in the morning peak, an increase of 34 vehicles. In the evening peak Bury Road queues increase from 42 to 77 vehicles, an increase of 35 vehicles.
4. Alternative junction arrangements have been tested, however as per the comments by Mott McDonald, potential improvements are limited due to the proximity of third party land. This prevents the roundabout from being enlarged and upgraded from a mini-roundabout to a standard roundabout. The only feasible option would be to signalise the junction, however the configuration of a signalised junction is constrained to what can fit within the existing highway boundary.
5. The junction has therefore been tested as a three-arm signalised junction however there are a number of issues related to this junction arrangement which include:
 - Access points to private drives, pub car park and pub servicing emerge within the junction itself, beyond the stop-lines;
 - Proximity of lay-bys and a bus stop close to the stop-lines
6. A plan showing the potential layout of a three-arm signalised junction is included in [Appendix 5](#).
7. The junction has been tested using LINSIG for an opening year of 2028 and a future year of 2033. The results show that the junction would be operating close to capacity in the morning peak in 2028 with other allocated site traffic added with a PRC of just 3.4%. Queues would extend to 21 vehicles on Rochdale Road in the morning peak.
8. With the addition of the H62 site allocation two out of three arms are over capacity in the morning peak with a PRC of -5.2%. Queues would extend to 25 vehicles on Rochdale Road. The results are shown in [Appendix 6](#) and are summarised below:

Table 7- Market St/Rochdale Rd/Bury Rd 2028

Arm	Weekday AM		Weekday PM	
	DOS (%)	MMQ	DOS (%)	MMQ
Base 2028 + Allocated Development Sites				
Market Street Left Ahead	50.7	12	45.6	11
Rochdale Road Right Left	87.0	21	79.2	16
Bury Road Ahead Right	86.0	12	78.8	12
Practical Reserve Capacity (PRC%)	3.4		13.6	
Total Junction Delay (pcuHR)	19.24		15.55	
Cycle Time (s)	120		120	
Base 2028 + Allocated Sites+ H62 site				
Market Street Left Ahead	55.5	14	47.8	12
Rochdale Road Right Left	93.1	25	84.4	19
Bury Road Ahead Right	94.7	16	83.8	18
Practical Reserve Capacity (PRC%)	-5.2		6.6	
Total Junction Delay (s)	26.21		18.72	
Cycle Time (s)	120		120	

- The junction has also been tested for a future year of 2033. This shows that without the H62 allocation the junction would have just 0.7% PRC and queues would extend to 23 vehicles on Rochdale Road.

Table 8- Market St/Rochdale Rd/Bury Rd 2033

Arm	Weekday AM		Weekday PM	
	DOS (%)	MMQ	DOS (%)	MMQ
Base 2033 + Allocated Development Sites				
Market Street Left Ahead	51.7	13	46.3	11
Rochdale Road Right Left	89.4	23	81.5	17
Bury Road Ahead Right	89.4	13	82.6	13
Practical Reserve Capacity (PRC%)	0.7		8.9	
Total Junction Delay (pcuHR)	21.35		16.81	
Cycle Time (s)	120		120	
Base 2033 + Allocated Sites+ H62 site				
Market Street Left Ahead	55.7	14	48.6	12
Rochdale Road Right Left	97.6	30	86.6	20
Bury Road Ahead Right	96.5	17	87.8	20
Practical Reserve Capacity (PRC%)	-8.4		2.6	
Total Junction Delay (s)	31.92		20.18	
Cycle Time (s)	120		120	

10. With the H62 development in AM peak 2033, queues would extend to 30 vehicles on Rochdale Road and 61 vehicles across all arms of the junction. PRC would reduce further to -8.4%. In addition, the PM peak would have two arms approaching capacity and queues of up to 20 vehicles on two arms.
11. These assessments do not include any pedestrian stages from being called. The upgrade of the junction would remove the existing zebra crossing and pedestrian crossing facilities would be incorporated into the signals. The inclusion of pedestrian stages would further erode the operation of the junction.

5.0 SUMMARY & CONCLUSION

1. Further investigations into the ability to safely access site H62 have been investigated using refreshed baseline traffic data from 2021.
2. The additional assessments have been carried out taking into account accurate trip rates, suitable background growth including committed developments and other allocated sites in the area.
3. The mini-roundabout junction of Market Street/Bury Road/Rochdale Road has been shown to be significantly over capacity with the addition of development traffic. The only viable improvement appears to be to signalise the junction, however there would still be significant queues of up to 60 vehicles across the junction in the PM peak. There is no guarantee that a signalised junction could be implemented given the location of existing access points; particularly servicing to the pub and the location of the car park access.
4. Whilst the allocation is for 400 dwellings it is not usual to see applications coming forward for more than the allocated number. An indication of the actual number of dwellings can be seen in the supporting documentation which refers to 456. All assessments within this note are on the basis of 400 dwellings and clearly any uplift in this figure would exacerbate any capacity issues.
5. Assessments have been carried out with the most recently available background traffic flows, however these are consistently lower than those previously recorded. As such, should background traffic flows return to pre-covid levels, the modelling results will be even poorer.
6. On the basis of the findings set out within this report, the allocation of the wider site incorporating all three parcels of land would be detrimental to capacity. Paragraph 110 of the NPPF states: *'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree'*.
7. As such the site allocation would be contrary to paragraph 111 of the NPPF as the residual cumulative impact on the road network would be severe, even if mitigation measures were viable.

S|C|P

APPENDIX 1

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL VEHICLESSelected regions and areas:

02 SOUTH EAST	
ES EAST SUSSEX	2 days
HF HERTFORDSHIRE	1 days
KC KENT	3 days
SC SURREY	1 days
WS WEST SUSSEX	4 days
03 SOUTH WEST	
DV DEVON	1 days
04 EAST ANGLIA	
NF NORFOLK	1 days
05 EAST MIDLANDS	
DS DERBYSHIRE	1 days
06 WEST MIDLANDS	
ST STAFFORDSHIRE	1 days
07 YORKSHIRE & NORTH LINCOLNSHIRE	
NE NORTH EAST LINCOLNSHIRE	1 days
11 SCOTLAND	
FA FALKIRK	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 110 to 799 (units:)
 Range Selected by User: 100 to 805 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/13 to 08/10/20

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	5 days
Tuesday	1 days
Wednesday	4 days
Thursday	4 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	17 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	3
Edge of Town	14

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	16
No Sub Category	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3	17 days
----	---------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,000 or Less	1 days
5,001 to 10,000	5 days
10,001 to 15,000	7 days
15,001 to 20,000	1 days
20,001 to 25,000	3 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	3 days
50,001 to 75,000	3 days
75,001 to 100,000	4 days
100,001 to 125,000	1 days
125,001 to 250,000	6 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	5 days
1.1 to 1.5	10 days
1.6 to 2.0	2 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	7 days
No	10 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	17 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	DS-03-A-02	MIXED HOUSES	DERBYSHIRE
	RADBOURNE LANE DERBY		
	Edge of Town Residential Zone		
	Total No of Dwellings:	371	
	Survey date: TUESDAY	10/07/18	Survey Type: MANUAL
2	DV-03-A-02	HOUSES & BUNGALOWS	DEVON
	MILLHEAD ROAD HONITON		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total No of Dwellings:	116	
	Survey date: FRIDAY	25/09/15	Survey Type: MANUAL
3	ES-03-A-03	MIXED HOUSES & FLATS	EAST SUSSEX
	SHEPHAM LANE POLEGATE		
	Edge of Town Residential Zone		
	Total No of Dwellings:	212	
	Survey date: MONDAY	11/07/16	Survey Type: MANUAL
4	ES-03-A-04	MIXED HOUSES & FLATS	EAST SUSSEX
	NEW LYDD ROAD CAMBER		
	Edge of Town Residential Zone		
	Total No of Dwellings:	134	
	Survey date: FRIDAY	15/07/16	Survey Type: MANUAL
5	FA-03-A-02	MIXED HOUSES	FALKIRK
	ROSEBANK AVENUE & SPRINGFIELD DRIVE FALKIRK		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total No of Dwellings:	161	
	Survey date: WEDNESDAY	29/05/13	Survey Type: MANUAL
6	HF-03-A-03	MIXED HOUSES	HERTFORDSHIRE
	HARE STREET ROAD BUNTINGFORD		
	Edge of Town Residential Zone		
	Total No of Dwellings:	160	
	Survey date: MONDAY	08/07/19	Survey Type: MANUAL
7	KC-03-A-04	SEMI-DETACHED & TERRACED	KENT
	KILN BARN ROAD AYLESFORD DITTON		
	Edge of Town Residential Zone		
	Total No of Dwellings:	110	
	Survey date: FRIDAY	22/09/17	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

8	KC-03-A-06 MARGATE ROAD HERNE BAY	MIXED HOUSES & FLATS	KENT
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 363 Survey date: WEDNESDAY 27/09/17		Survey Type: MANUAL
9	KC-03-A-07 RECVLVER ROAD HERNE BAY	MIXED HOUSES	KENT
	Edge of Town Residential Zone Total No of Dwellings: 288 Survey date: WEDNESDAY 27/09/17		Survey Type: MANUAL
10	NE-03-A-02 HANOVER WALK SCUNTHORPE	SEMI DETACHED & DETACHED	NORTH EAST LINCOLNSHIRE
	Edge of Town No Sub Category Total No of Dwellings: 432 Survey date: MONDAY 12/05/14		Survey Type: MANUAL
11	NF-03-A-06 BEAUFORT WAY GREAT YARMOUTH BRADWELL	MIXED HOUSES	NORFOLK
	Edge of Town Residential Zone Total No of Dwellings: 275 Survey date: MONDAY 23/09/19		Survey Type: MANUAL
12	SC-03-A-05 REIGATE ROAD HORLEY	MIXED HOUSES	SURREY
	Edge of Town Residential Zone Total No of Dwellings: 207 Survey date: MONDAY 01/04/19		Survey Type: MANUAL
13	ST-03-A-07 BEACONSIDE STAFFORD MARSTON GATE	DETACHED & SEMI-DETACHED	STAFFORDSHIRE
	Edge of Town Residential Zone Total No of Dwellings: 248 Survey date: WEDNESDAY 22/11/17		Survey Type: MANUAL
14	WS-03-A-04 HILLS FARM LANE HORSHAM BROADBRIDGE HEATH	MIXED HOUSES	WEST SUSSEX
	Edge of Town Residential Zone Total No of Dwellings: 151 Survey date: THURSDAY 11/12/14		Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

15	WS-03-A-06	MIXED HOUSES	WEST SUSSEX
	ELLIS ROAD WEST HORSHAM S BROADBRIDGE HEATH Edge of Town Residential Zone Total No of Dwellings: 799 Survey date: THURSDAY 02/03/17		Survey Type: MANUAL
16	WS-03-A-08	MIXED HOUSES	WEST SUSSEX
	ROUNDSTONE LANE ANGMERING Edge of Town Residential Zone Total No of Dwellings: 180 Survey date: THURSDAY 19/04/18		Survey Type: MANUAL
17	WS-03-A-09	MIXED HOUSES & FLATS	WEST SUSSEX
	LITTLEHAMPTON ROAD WORTHING WEST DURRINGTON Edge of Town Residential Zone Total No of Dwellings: 197 Survey date: THURSDAY 05/07/18		Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL VEHICLES**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	17	259	0.078	17	259	0.316	17	259	0.394
08:00 - 09:00	17	259	0.126	17	259	0.388	17	259	0.514
09:00 - 10:00	17	259	0.144	17	259	0.171	17	259	0.315
10:00 - 11:00	17	259	0.123	17	259	0.154	17	259	0.277
11:00 - 12:00	17	259	0.129	17	259	0.144	17	259	0.273
12:00 - 13:00	17	259	0.157	17	259	0.149	17	259	0.306
13:00 - 14:00	17	259	0.158	17	259	0.153	17	259	0.311
14:00 - 15:00	17	259	0.164	17	259	0.186	17	259	0.350
15:00 - 16:00	17	259	0.262	17	259	0.172	17	259	0.434
16:00 - 17:00	17	259	0.279	17	259	0.164	17	259	0.443
17:00 - 18:00	17	259	0.348	17	259	0.157	17	259	0.505
18:00 - 19:00	17	259	0.319	17	259	0.179	17	259	0.498
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.287			2.333			4.620

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected: 110 - 799 (units:)
Survey date range: 01/01/13 - 08/10/20
Number of weekdays (Monday-Friday): 17
Number of Saturdays: 0
Number of Sundays: 0
Surveys automatically removed from selection: 0
Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL CYCLISTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	17	259	0.005	17	259	0.007	17	259	0.012
08:00 - 09:00	17	259	0.006	17	259	0.012	17	259	0.018
09:00 - 10:00	17	259	0.000	17	259	0.002	17	259	0.002
10:00 - 11:00	17	259	0.002	17	259	0.003	17	259	0.005
11:00 - 12:00	17	259	0.002	17	259	0.004	17	259	0.006
12:00 - 13:00	17	259	0.003	17	259	0.005	17	259	0.008
13:00 - 14:00	17	259	0.002	17	259	0.002	17	259	0.004
14:00 - 15:00	17	259	0.003	17	259	0.003	17	259	0.006
15:00 - 16:00	17	259	0.005	17	259	0.005	17	259	0.010
16:00 - 17:00	17	259	0.011	17	259	0.009	17	259	0.020
17:00 - 18:00	17	259	0.012	17	259	0.009	17	259	0.021
18:00 - 19:00	17	259	0.008	17	259	0.007	17	259	0.015
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.059			0.068			0.127

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PEDESTRIANS**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	17	259	0.015	17	259	0.025	17	259	0.040
08:00 - 09:00	17	259	0.028	17	259	0.085	17	259	0.113
09:00 - 10:00	17	259	0.034	17	259	0.036	17	259	0.070
10:00 - 11:00	17	259	0.029	17	259	0.035	17	259	0.064
11:00 - 12:00	17	259	0.025	17	259	0.027	17	259	0.052
12:00 - 13:00	17	259	0.032	17	259	0.025	17	259	0.057
13:00 - 14:00	17	259	0.025	17	259	0.025	17	259	0.050
14:00 - 15:00	17	259	0.028	17	259	0.039	17	259	0.067
15:00 - 16:00	17	259	0.084	17	259	0.041	17	259	0.125
16:00 - 17:00	17	259	0.057	17	259	0.034	17	259	0.091
17:00 - 18:00	17	259	0.047	17	259	0.029	17	259	0.076
18:00 - 19:00	17	259	0.038	17	259	0.040	17	259	0.078
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.442			0.441			0.883

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PUBLIC TRANSPORT USERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

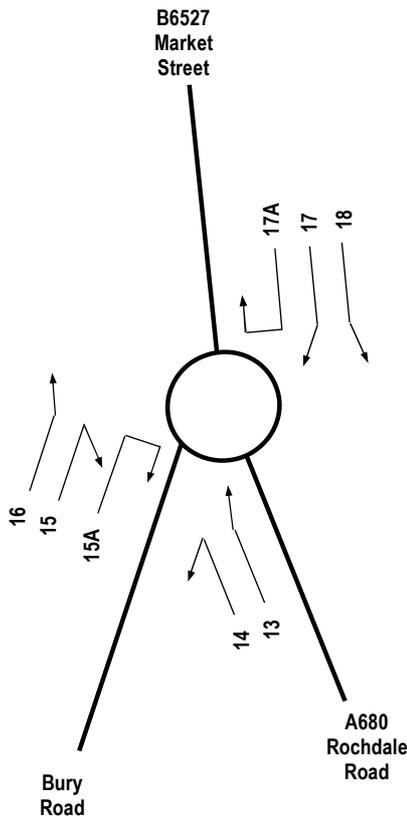
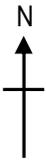
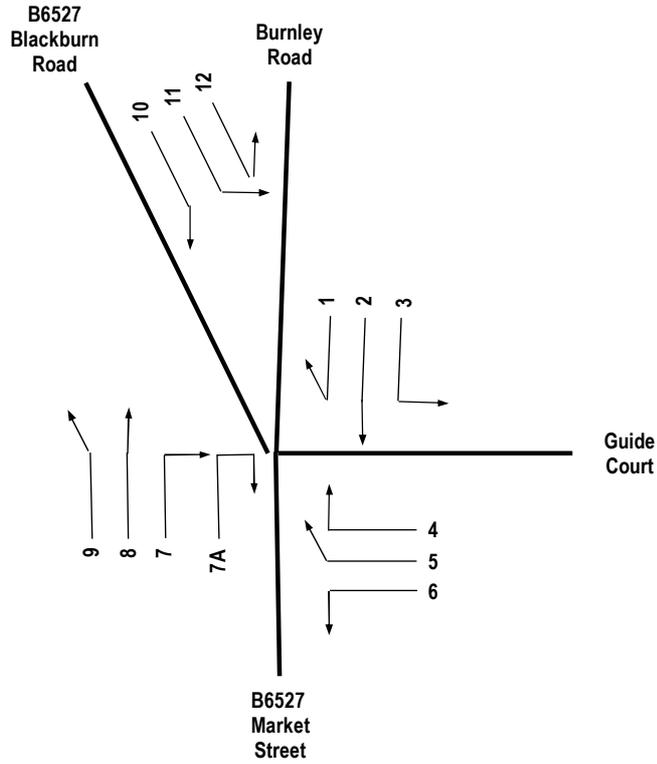
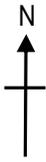
Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	17	259	0.002	17	259	0.015	17	259	0.017
08:00 - 09:00	17	259	0.001	17	259	0.023	17	259	0.024
09:00 - 10:00	17	259	0.002	17	259	0.010	17	259	0.012
10:00 - 11:00	17	259	0.002	17	259	0.004	17	259	0.006
11:00 - 12:00	17	259	0.002	17	259	0.005	17	259	0.007
12:00 - 13:00	17	259	0.002	17	259	0.004	17	259	0.006
13:00 - 14:00	17	259	0.005	17	259	0.004	17	259	0.009
14:00 - 15:00	17	259	0.003	17	259	0.002	17	259	0.005
15:00 - 16:00	17	259	0.019	17	259	0.007	17	259	0.026
16:00 - 17:00	17	259	0.014	17	259	0.005	17	259	0.019
17:00 - 18:00	17	259	0.014	17	259	0.003	17	259	0.017
18:00 - 19:00	17	259	0.013	17	259	0.004	17	259	0.017
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.079			0.086			0.165

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

S|C|P

APPENDIX 2



DRAWING TITLE

TRAFFIC MOVEMENT REFERENCE

JOB TITLE

20.046 EDENFIELD

Transport Data Specialists Ltd

W: www.transportds.co.uk
 E: enquiries@transportds.co.uk
 T: 0777 625 2475 T: 0794 007 1260

DRAWN BY
DC

DATE
SEP 2021

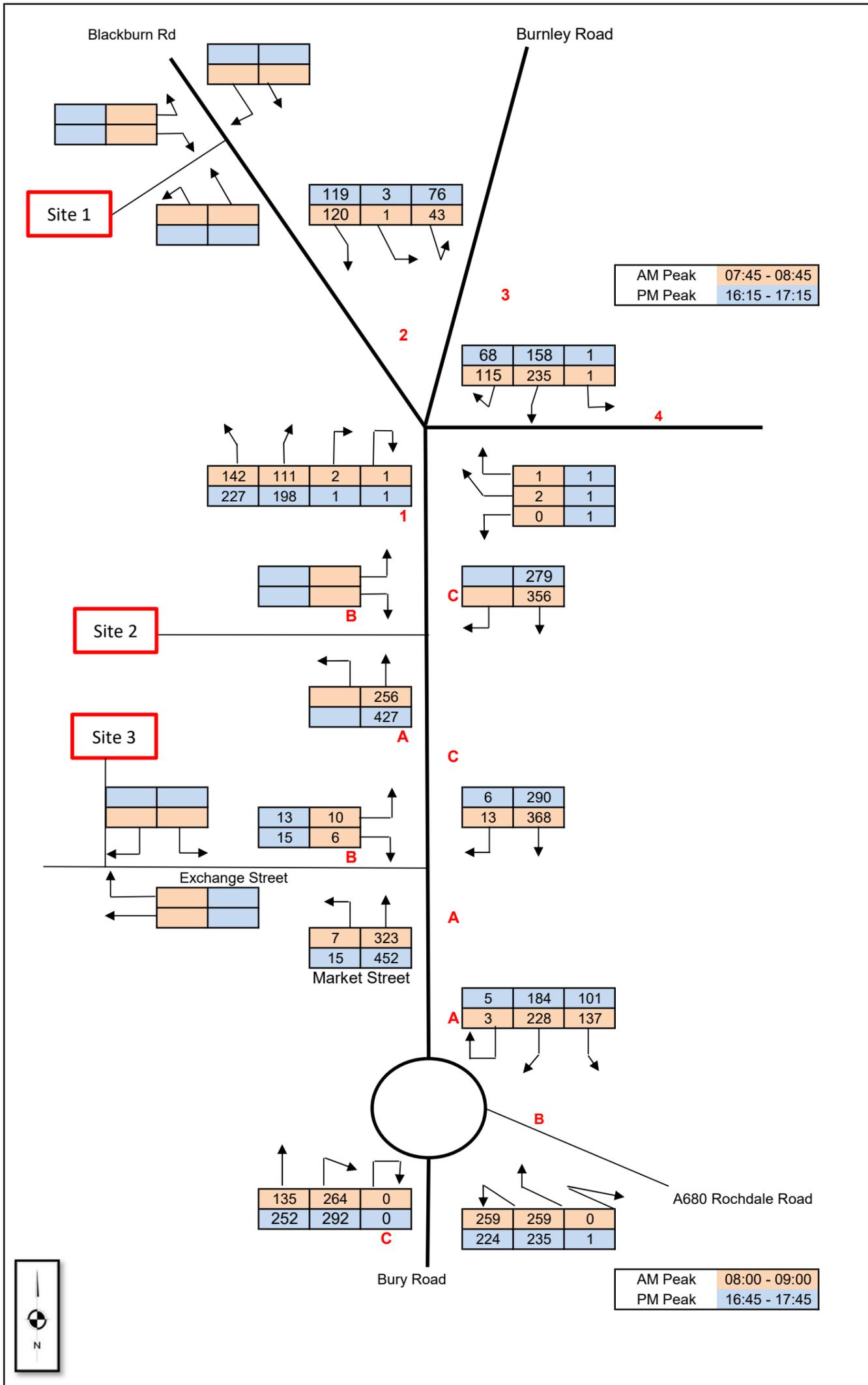
SCALE
NTS

REF
FIGURE 1

B6527 Market Street/A680 Rochdale Road/Bury Road - Wednesday 15th September 2021																		
Time Beginning	13A		13		14		15A		15		16		17A		17		18	
	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV
0700	0	0	44	1	44	1	1	0	35	0	6	1	1	0	27	2	31	0
0715	0	0	60	0	60	0	0	0	44	1	12	1	1	0	48	2	37	0
0730	0	0	51	10	51	10	0	0	45	0	23	2	0	0	38	3	39	0
0745	0	0	58	1	58	1	0	0	45	2	19	1	1	0	53	2	38	0
0800	0	0	63	1	63	1	0	0	57	5	31	4	0	0	44	3	34	1
0815	0	0	73	3	73	3	0	0	69	2	23	1	1	0	66	2	44	1
0830	0	0	51	1	51	1	0	0	51	6	26	1	0	0	44	2	32	1
0845	0	0	56	5	56	5	0	0	48	4	36	2	1	0	50	1	27	1
0900	0	0	55	3	55	3	0	0	56	8	36	3	1	0	50	4	28	0
0915	0	0	28	7	28	7	0	0	40	4	22	1	1	0	33	1	14	3
0930	0	0	28	5	28	5	0	0	37	2	15	2	0	0	35	1	14	0
0945	0	0	51	3	51	3	0	0	38	3	25	1	0	0	29	1	16	1
B6527 Market Street/A680 Rochdale Road/Bury Road - Wednesday 15th September 2021																		
Time Beginning	13A		13		14		15A		15		16		17A		17		18	
	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV
1530	0	0	29	1	67	2	0	1	46	4	36	2	0	0	38	1	25	2
1545	0	0	33	1	56	2	0	0	52	4	44	0	0	0	37	2	19	1
1600	1	0	47	0	63	1	0	0	43	4	46	2	0	0	38	1	21	0
1615	0	0	48	3	55	2	0	0	52	2	47	1	1	0	53	3	28	0
1630	0	0	43	1	54	1	0	0	64	0	44	3	2	0	37	1	36	0
1645	0	0	56	0	50	1	0	0	70	2	56	1	1	0	41	1	15	0
1700	0	0	55	1	64	1	0	0	69	2	62	5	3	0	45	2	39	0
1715	0	0	68	1	60	0	0	0	54	2	60	0	0	0	41	2	21	0
1730	1	0	52	0	46	0	0	0	87	0	58	2	1	0	43	2	26	0
1745	0	0	52	1	53	1	0	0	64	0	68	3	1	0	36	1	14	0
1800	0	0	36	0	48	0	1	0	52	1	38	0	1	0	46	2	25	0
1815	0	0	27	0	47	2	0	0	56	1	47	4	1	0	36	0	15	0

S|C|P

APPENDIX 3



Base Flows 2021

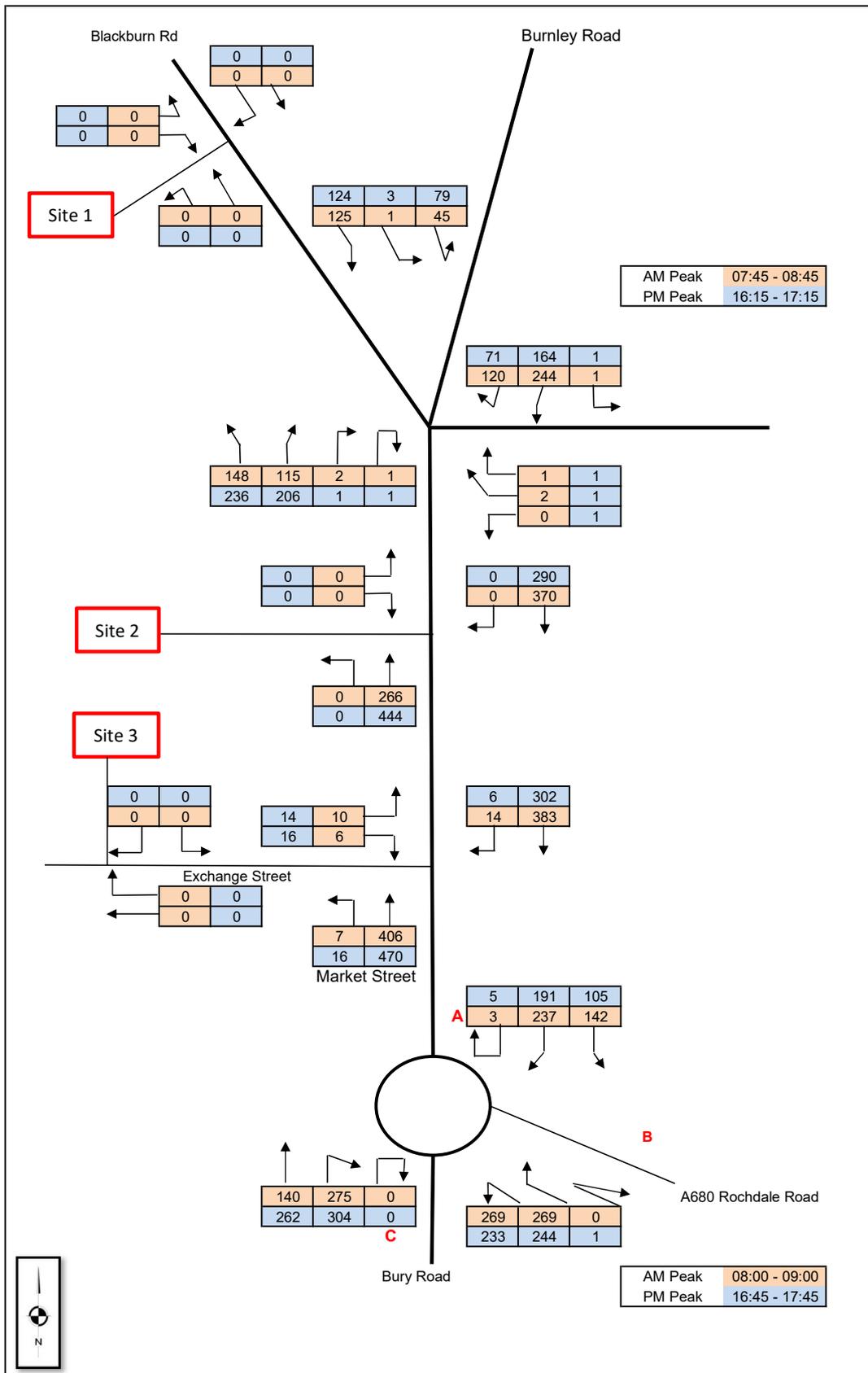
Edensfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.1



Base Flows 2028

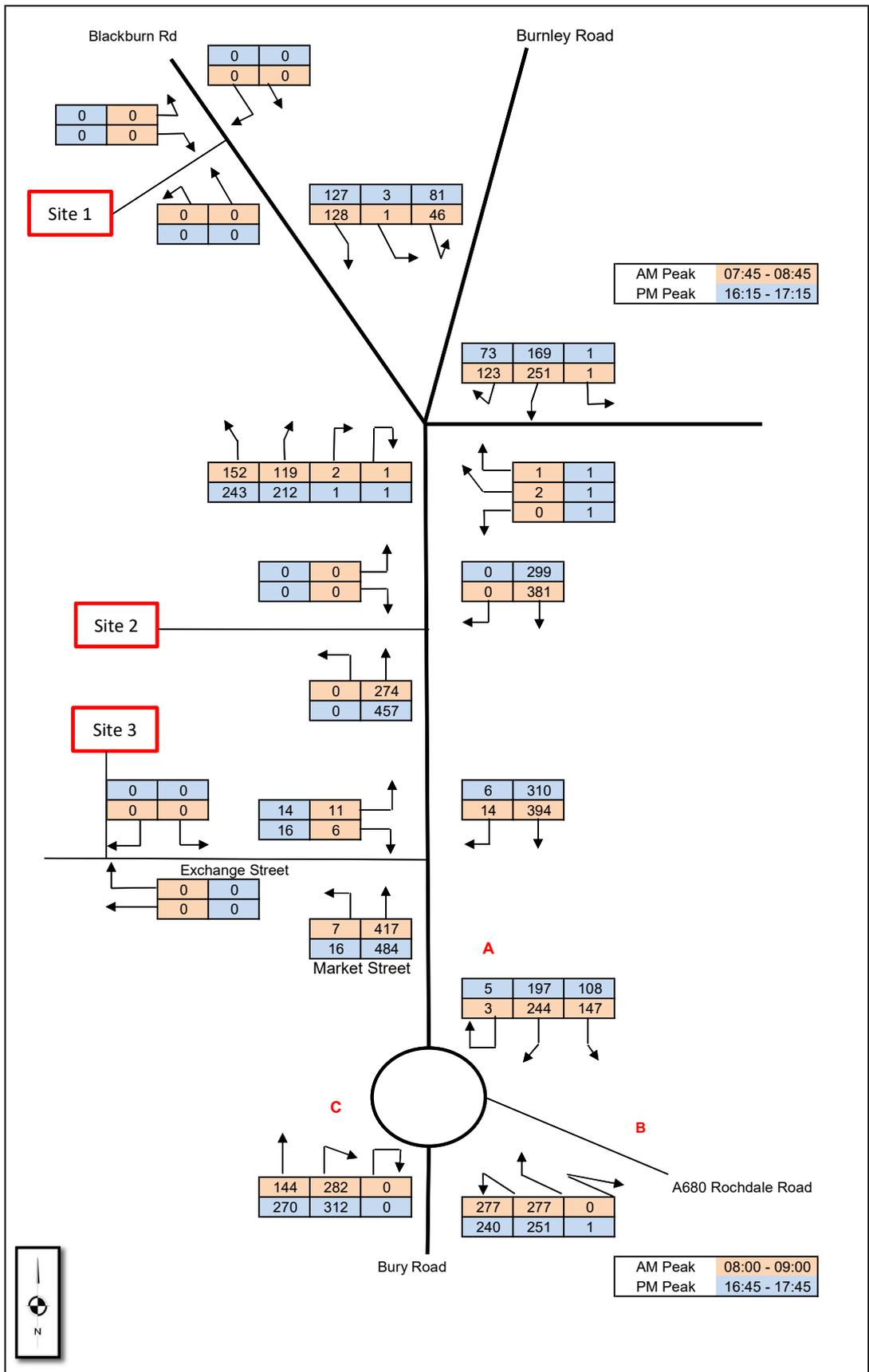
Edensfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.2



Base Flows 2033

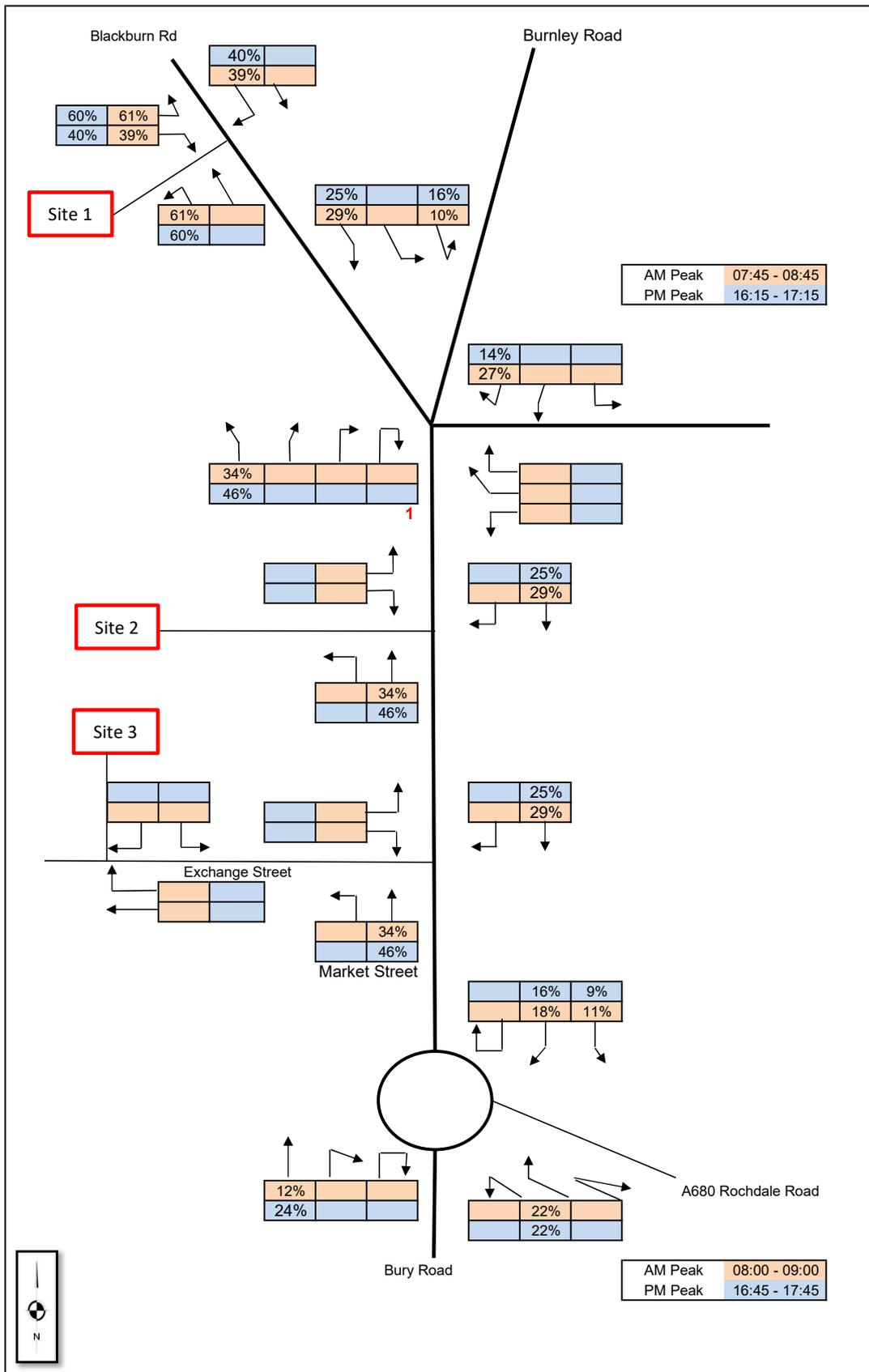
Edenfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.3



Site 1 Distribution

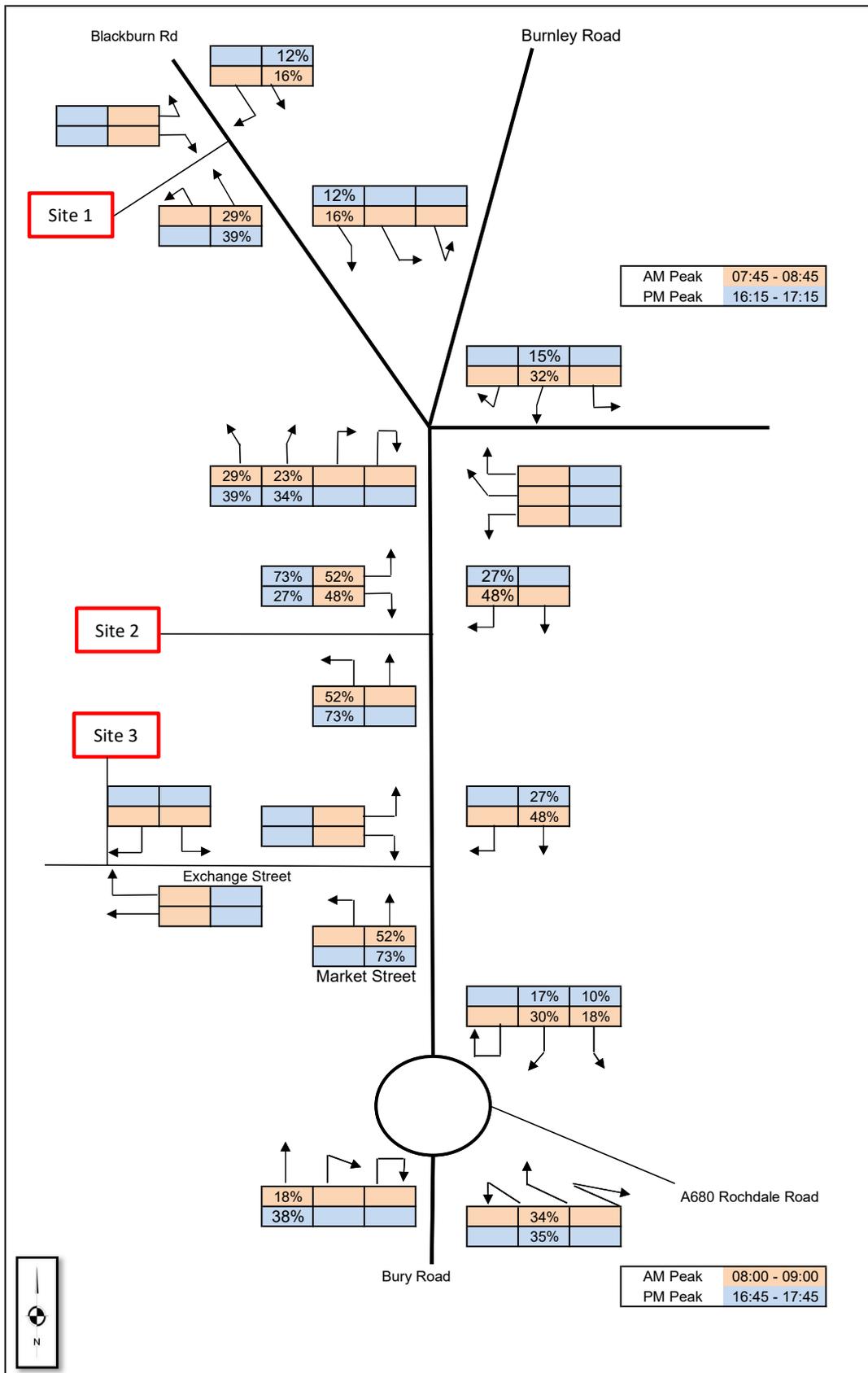
Edenfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.4



Site 2 Distribution

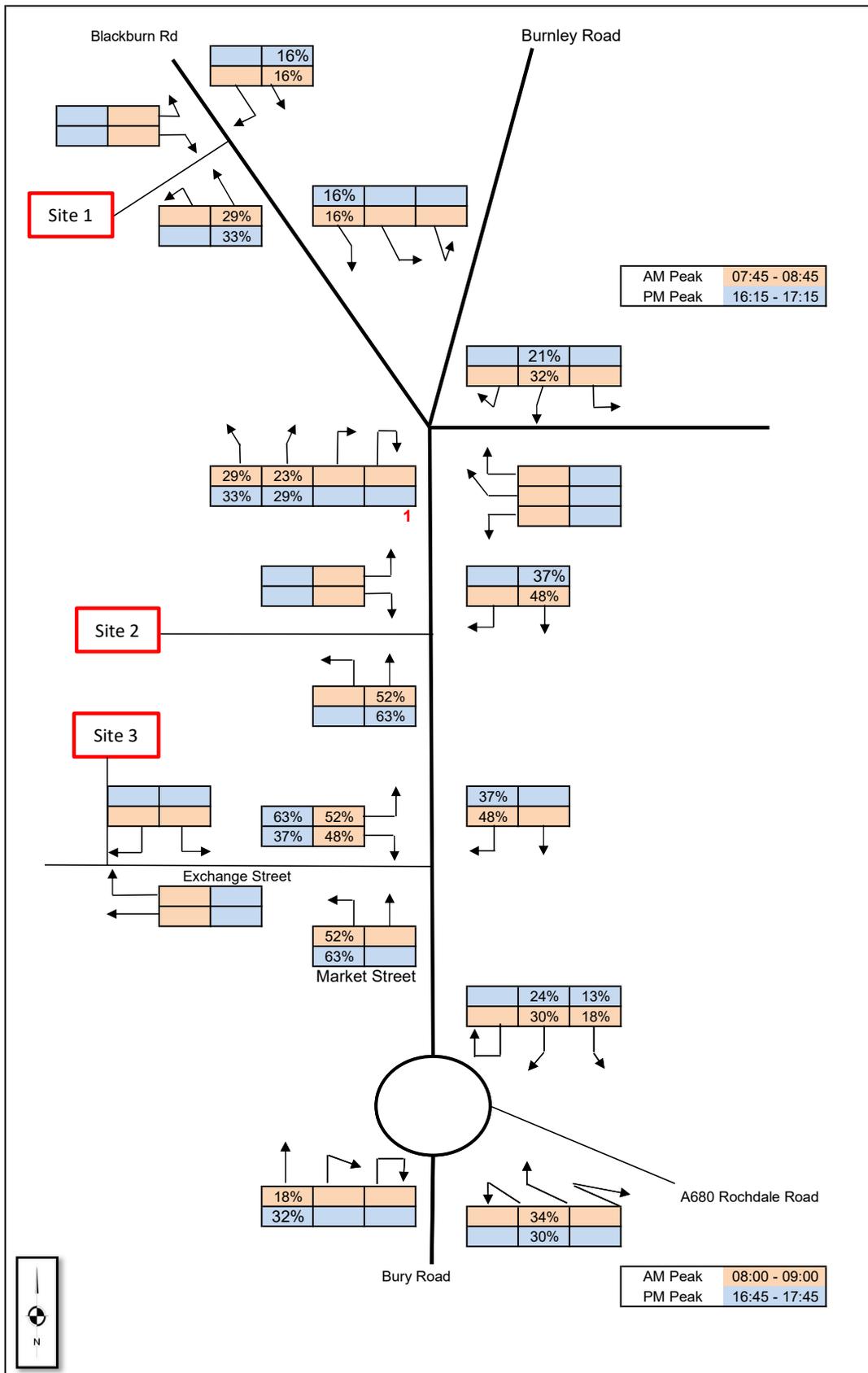
Edenfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.5



Site 3 Distribution

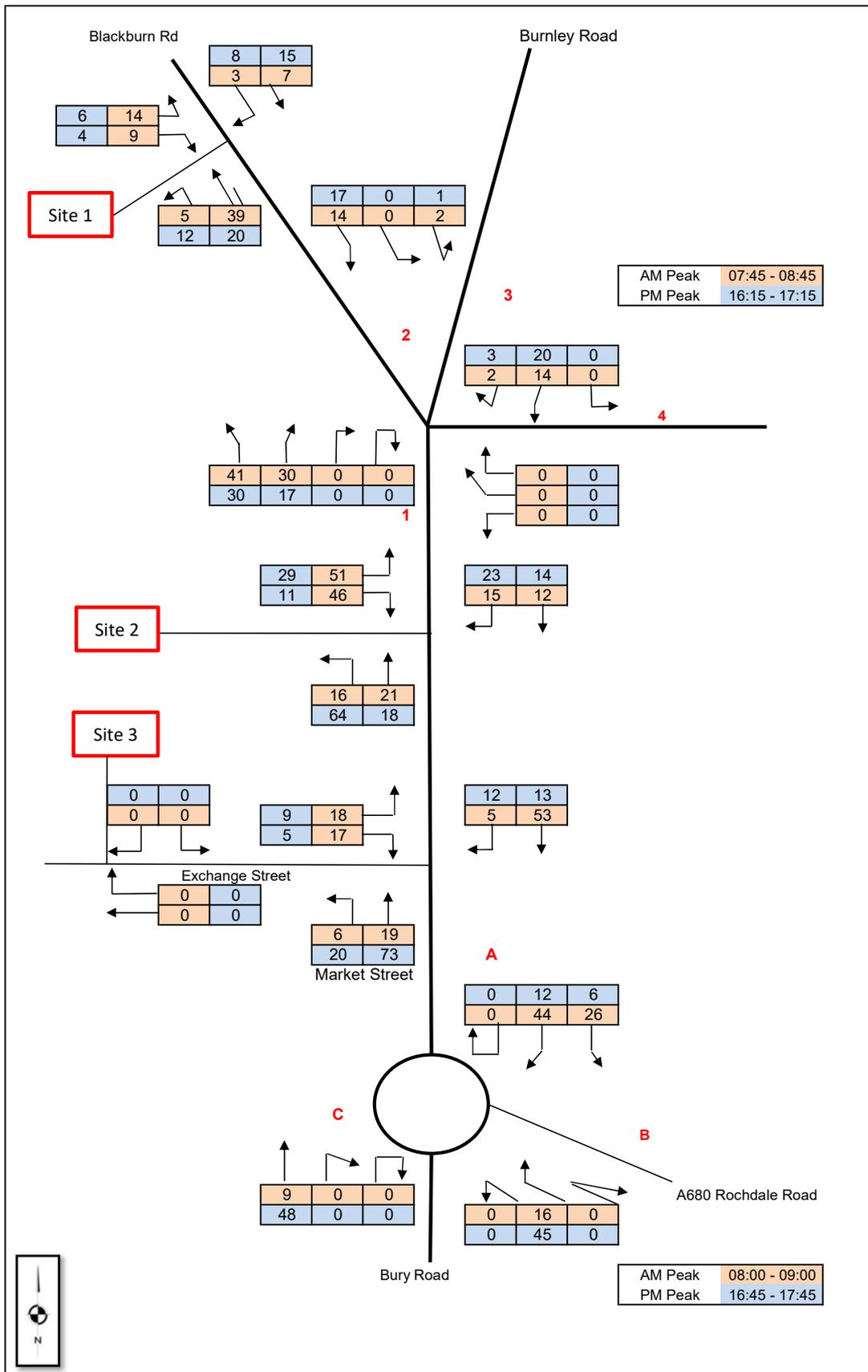
Edenfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.6



Assigned Development Traffic From H72

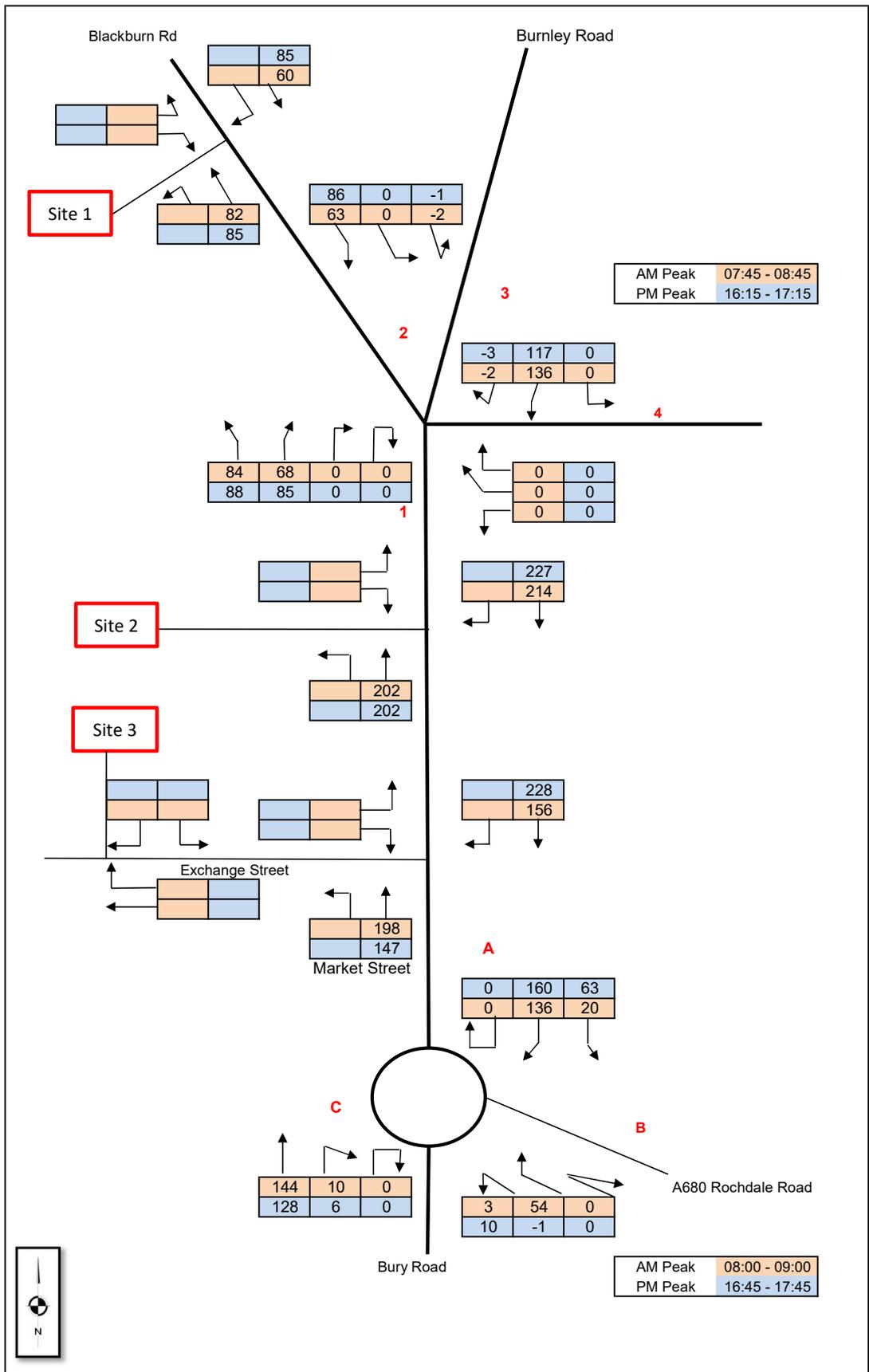
Edensfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.7



Allocated Traffic Flows (Less H72 Assigned Flows)

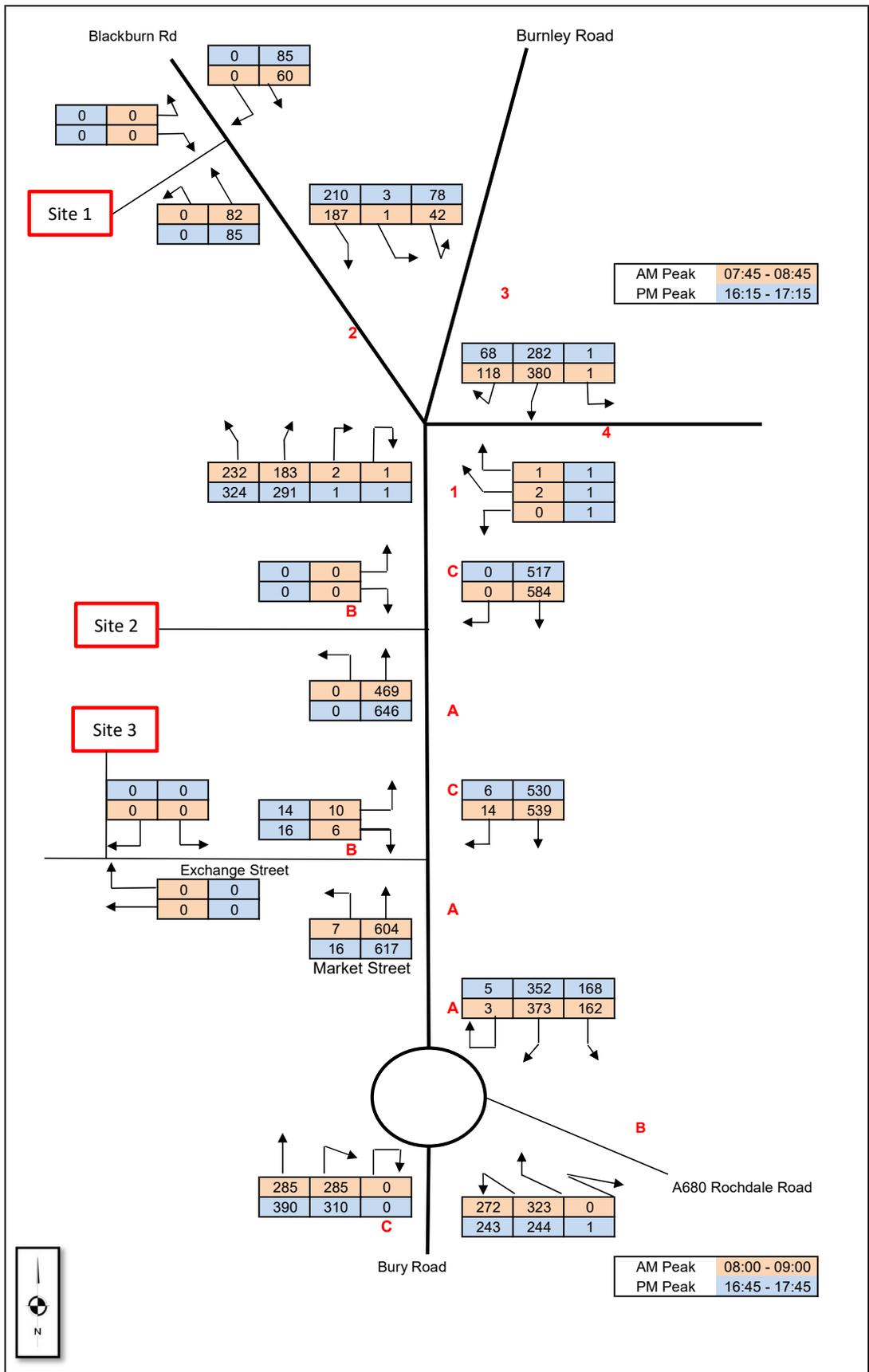
Edenfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.8



Base 2028 + Allocated Traffic

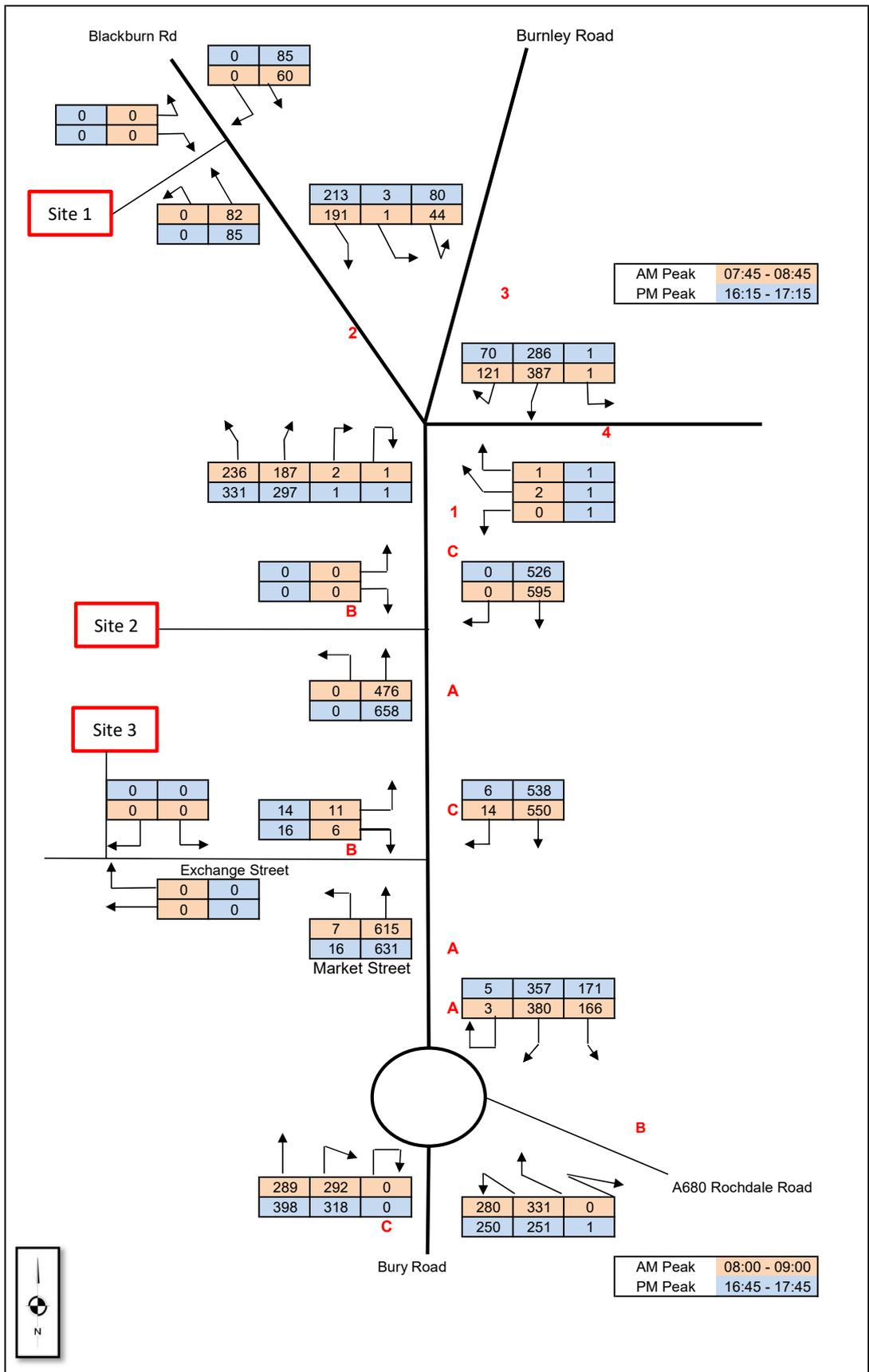
Edenfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.9



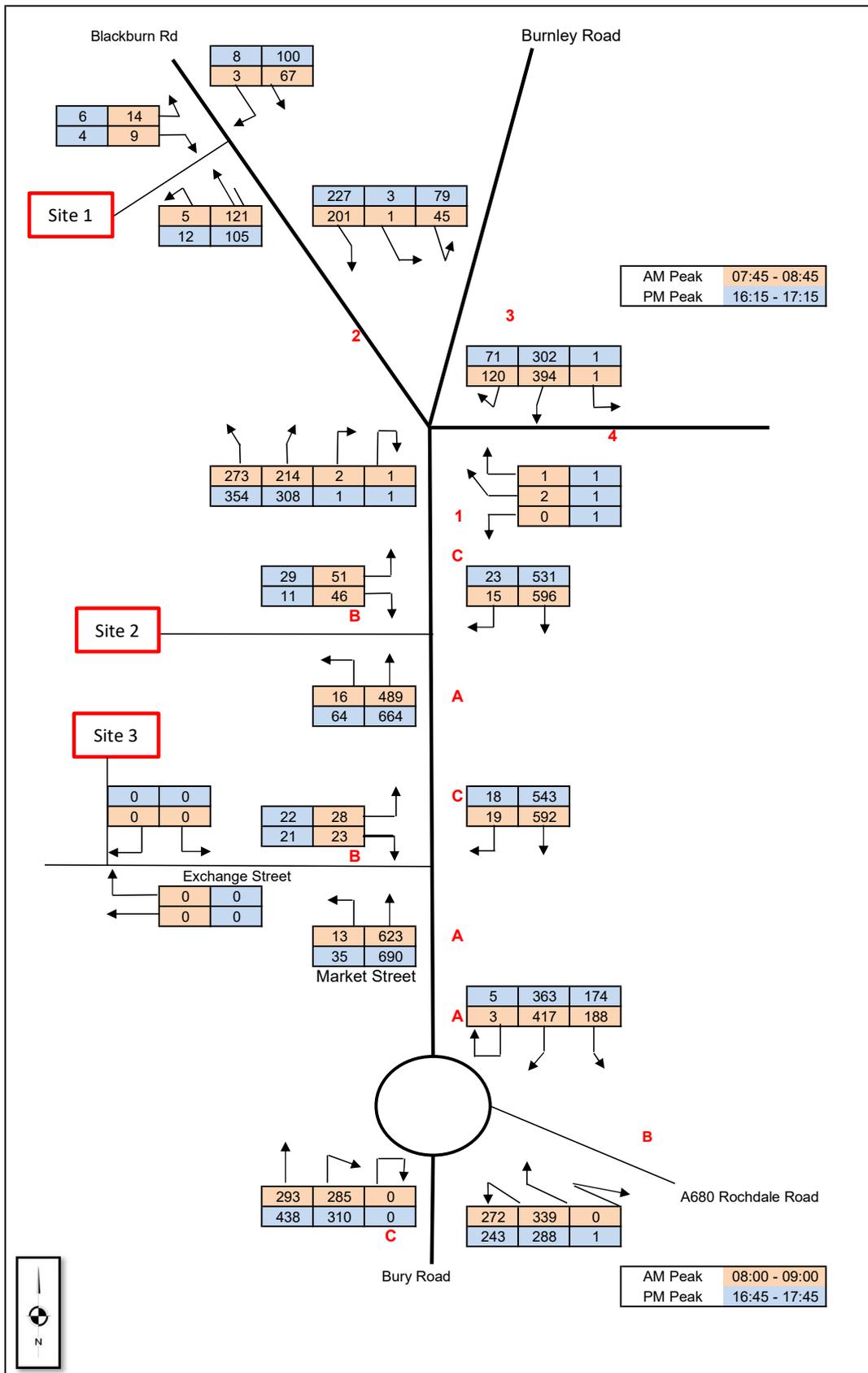
Base 2033 + Allocated Traffic

Edenfield



12 October 2021
 Job Number - SCP/210421a

Traffic Figure 8.10



Base 2028 + Allocated + H72 Development Traffic

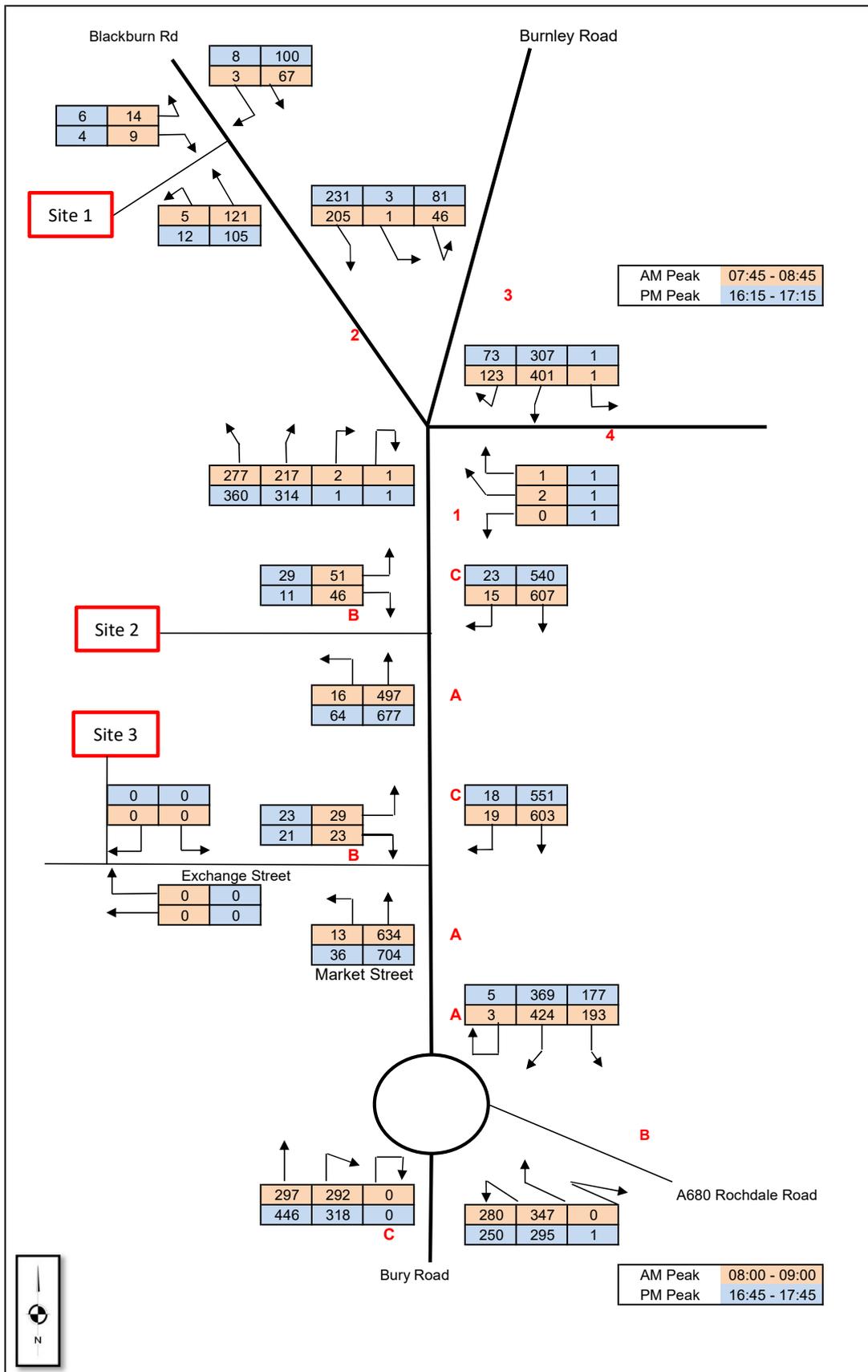
Edenfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.11



Base 2033 + Allocated + H72 Development Traffic

Edenfield



12 October 2021

Job Number - SCP/210421a

Traffic Figure 8.12

S|C|P

APPENDIX 4

Junctions 9
ARCADY 9 - Roundabout Module
Version: 9.5.0.6896 © Copyright TRL Limited, 2018
For sales and distribution information, program advice and maintenance, contact TRL: +44 (0)1344 379777 software@trl.co.uk www.trlsoftware.co.uk
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Filename: Arcady_BA 2028 + 2033.j9

Path: Z:\Job Library\2021\210421 - Blackburn Road, Edenfield\Traffic Data\Junction Models

Report generation date: 05/10/2021 14:50:19

- »Base 2028 + allocated site traffic, AM
- »Base 2028 + allocated site traffic , PM
- »Base 2033 + allocated site traffic, AM
- »Base 2033 + allocated site traffic, PM
- »Base 2028 + allocated site traffic + dev traffic, AM
- »Base 2028 + allocated site traffic + dev traffic, PM
- »Base 2033 + allocated site traffic + dev traffic, AM
- »Base 2033 + allocated site traffic + dev traffic, PM

Summary of junction performance

	AM				PM			
	Queue (PCU)	Delay (s)	RFC	LOS	Queue (PCU)	Delay (s)	RFC	LOS
Base 2028 + allocated site traffic								
Arm 1	2.1	13.28	0.68	B	2.0	12.74	0.67	B
Arm 2	73.5	443.60	1.25	F	15.8	108.19	1.00	F
Arm 3	6.9	42.41	0.88	E	34.0	150.67	1.06	F
Base 2033 + allocated site traffic								
Arm 1	2.3	14.13	0.70	B	2.1	13.18	0.68	B
Arm 2	86.0	535.94	1.29	F	21.4	137.14	1.03	F
Arm 3	7.7	46.65	0.90	E	42.1	180.94	1.09	F
Base 2028 + allocated site traffic + dev traffic								
Arm 1	3.3	18.20	0.77	C	2.1	12.82	0.67	B
Arm 2	101.5	658.26	1.35	F	35.9	209.02	1.10	F
Arm 3	7.2	43.38	0.89	E	67.4	342.04	1.16	F
Base 2033 + allocated site traffic + dev traffic								
Arm 1	3.6	19.92	0.79	C	2.2	13.33	0.69	B
Arm 2	119.5	762.73	1.40	F	44.8	253.56	1.14	F
Arm 3	8.0	47.70	0.90	E	76.7	398.83	1.19	F

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	A680 Rochdale Road / Bury Road mini roundabout
Location	Edenfield
Site number	
Date	02/08/2018
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	18330
Enumerator	SCP\anna.stephens
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	PCU	PCU	perHour	s	-Min	perMin

Analysis Options

Mini-roundabout model	Calculate Queue Percentiles	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
JUNCTIONS 9			0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D1	Base 2028 + allocated site traffic	AM	ONE HOUR	07:45	09:15	15
D2	Base 2028 + allocated site traffic	PM	ONE HOUR	16:30	18:00	15
D3	Base 2033 + allocated site traffic	AM	ONE HOUR	07:45	09:15	15
D4	Base 2033 + allocated site traffic	PM	ONE HOUR	16:30	18:00	15
D5	Base 2028 + allocated site traffic + dev traffic	AM	ONE HOUR	07:45	09:15	15
D6	Base 2028 + allocated site traffic + dev traffic	PM	ONE HOUR	16:30	18:00	15
D7	Base 2033 + allocated site traffic + dev traffic	AM	ONE HOUR	07:45	09:15	15
D8	Base 2033 + allocated site traffic + dev traffic	PM	ONE HOUR	16:30	18:00	15

Analysis Set Details

ID	Network flow scaling factor (%)
A1	100.000

Base 2028 + allocated site traffic, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	A680 Rochdale Road / Bury Road roundabout	Mini-roundabout		1, 2, 3	173.38	F

Junction Network Options

Driving side	Lighting	Road surface	In London
Left	Normal/unknown	Normal/unknown	

Arms

Arms

Arm	Name	Description
1	Market Street	
2	Rochdale Road	
3	Bury Road	

Mini Roundabout Geometry

Arm	Approach road half-width (m)	Minimum approach road half-width (m)	Entry width (m)	Effective flare length (m)	Distance to next arm (m)	Entry corner kerb line distance (m)	Gradient over 50m (%)	Kerbed central island
1	3.70	3.70	5.30	5.0	16.40	15.30	0.0	
2	2.80	2.80	4.20	2.4	13.60	9.10	0.0	
3	3.30	3.30	3.30	0.0	17.30	17.40	0.0	

Slope / Intercept / Capacity

Roundabout Slope and Intercept used in model

Arm	Final slope	Final intercept (PCU/hr)
1	0.676	1083
2	0.602	775
3	0.684	907

The slope and intercept shown above include any corrections and adjustments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D1	Base 2028 + allocated site traffic	AM	ONE HOUR	07:45	09:15	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
1		✓	538	100.000
2		✓	595	100.000
3		✓	570	100.000

Origin-Destination Data

Demand (PCU/hr)

From	To		
	1	2	3
1	3	162	373
2	323	0	272
3	285	285	0

Vehicle Mix

Heavy Vehicle Percentages

From	To		
	1	2	3
1	0	2	4
2	5	0	5
3	6	9	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1	0.68	13.28	2.1	B
2	1.25	443.60	73.5	F
3	0.88	42.41	6.9	E

Main Results for each time segment

07:45 - 08:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	405	212	940	0.431	402	0.8	6.883	A
2	448	281	606	0.739	437	2.7	21.190	C
3	429	240	743	0.577	423	1.4	11.901	B

08:00 - 08:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	484	254	911	0.531	482	1.1	8.643	A
2	535	337	572	0.934	514	8.0	51.672	F
3	512	282	714	0.717	508	2.6	18.335	C

08:15 - 08:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	592	307	876	0.677	589	2.1	12.802	B
2	655	411	528	1.242	523	41.1	187.496	F
3	628	287	711	0.883	613	6.1	35.251	E

08:30 - 08:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	592	312	872	0.680	592	2.1	13.279	B
2	655	414	526	1.245	525	73.5	397.316	F
3	628	288	710	0.884	625	6.9	42.407	E

08:45 - 09:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	484	264	905	0.535	487	1.2	8.994	A
2	535	341	570	0.938	562	66.7	443.601	F
3	512	308	696	0.736	527	3.2	24.483	C

09:00 - 09:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	405	217	936	0.433	407	0.8	7.052	A
2	448	284	604	0.741	595	30.0	296.751	F
3	429	325	685	0.627	435	1.9	15.792	C

Base 2028 + allocated site traffic , PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	A680 Rochdale Road / Bury Road roundabout	Mini-roundabout		1, 2, 3	96.29	F

Junction Network Options

Driving side	Lighting	Road surface	In London
Left	Normal/unknown	Normal/unknown	

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D2	Base 2028 + allocated site traffic	PM	ONE HOUR	16:30	18:00	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
1		✓	525	100.000
2		✓	488	100.000
3		✓	700	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		1	2	3
From	1	5	168	352
	2	244	1	243
	3	390	310	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		1	2	3
From	1	0	0	4
	2	1	0	1
	3	3	2	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1	0.67	12.74	2.0	B
2	1.00	108.19	15.8	F
3	1.06	150.67	34.0	F

Main Results for each time segment

16:30 - 16:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	395	231	927	0.426	392	0.8	6.872	A
2	367	267	615	0.598	362	1.4	14.067	B
3	527	185	780	0.675	519	2.0	13.729	B

16:45 - 17:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	472	275	897	0.526	471	1.1	8.640	A
2	439	320	583	0.753	433	2.8	23.491	C
3	629	222	755	0.833	620	4.4	25.583	D

17:00 - 17:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	578	314	871	0.664	575	2.0	12.340	B
2	537	391	540	0.995	503	11.3	67.820	F
3	771	258	730	1.055	706	20.6	80.109	F

17:15 - 17:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	578	319	867	0.666	578	2.0	12.737	B
2	537	393	539	0.997	519	15.8	108.188	F
3	771	266	725	1.063	717	34.0	150.672	F

17:30 - 17:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	472	318	868	0.544	475	1.2	9.470	A
2	439	323	581	0.755	488	3.6	50.270	F
3	629	249	736	0.855	715	12.6	123.663	F

17:45 - 18:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	395	252	912	0.433	397	0.8	7.200	A
2	367	270	613	0.600	375	1.6	15.782	C
3	527	192	776	0.680	568	2.3	20.992	C

Base 2033 + allocated site traffic, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	A680 Rochdale Road / Bury Road roundabout	Mini-roundabout		1, 2, 3	208.11	F

Junction Network Options

Driving side	Lighting	Road surface	In London
Left	Normal/unknown	Normal/unknown	

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D3	Base 2033 + allocated site traffic	AM	ONE HOUR	07:45	09:15	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
1		✓	549	100.000
2		✓	611	100.000
3		✓	581	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		1	2	3
From	1	3	166	380
	2	331	0	280
	3	289	292	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		1	2	3
From	1	0	2	4
	2	5	0	5
	3	6	9	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1	0.70	14.13	2.3	B
2	1.29	535.94	86.0	F
3	0.90	46.65	7.7	E

Main Results for each time segment

07:45 - 08:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	413	217	936	0.441	410	0.8	7.031	A
2	460	286	603	0.763	448	3.0	22.866	C
3	437	245	740	0.591	431	1.5	12.332	B

08:00 - 08:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	494	260	907	0.544	492	1.2	8.927	A
2	549	343	569	0.966	522	9.8	60.176	F
3	522	286	712	0.734	517	2.8	19.408	C

08:15 - 08:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	604	313	871	0.694	600	2.2	13.541	B
2	673	419	523	1.286	520	48.0	218.282	F
3	640	285	712	0.898	624	6.8	37.960	E

08:30 - 08:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	604	320	867	0.697	604	2.3	14.128	B
2	673	421	522	1.290	521	86.0	463.713	F
3	640	286	712	0.899	636	7.7	46.655	E

08:45 - 09:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	494	271	900	0.549	498	1.3	9.350	A
2	549	347	566	0.970	559	83.4	535.936	F
3	522	306	698	0.748	539	3.5	26.470	D

09:00 - 09:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	413	223	932	0.443	415	0.8	7.220	A
2	460	290	601	0.765	593	50.1	407.500	F
3	437	324	686	0.638	443	2.0	16.355	C

Base 2033 + allocated site traffic, PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	A680 Rochdale Road / Bury Road roundabout	Mini-roundabout		1, 2, 3	117.32	F

Junction Network Options

Driving side	Lighting	Road surface	In London
Left	Normal/unknown	Normal/unknown	

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D4	Base 2033 + allocated site traffic	PM	ONE HOUR	16:30	18:00	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
1		✓	533	100.000
2		✓	502	100.000
3		✓	716	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		1	2	3
From	1	5	171	357
	2	251	1	250
	3	398	318	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		1	2	3
From	1	0	0	4
	2	1	0	1
	3	3	2	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1	0.68	13.18	2.1	B
2	1.03	137.14	21.4	F
3	1.09	180.94	42.1	F

Main Results for each time segment

16:30 - 16:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	401	236	923	0.435	398	0.8	6.999	A
2	378	270	613	0.617	372	1.6	14.745	B
3	539	190	777	0.694	530	2.2	14.500	B

16:45 - 17:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	479	282	892	0.537	478	1.2	8.875	A
2	451	324	580	0.778	445	3.2	25.726	D
3	644	228	751	0.857	632	5.1	28.549	D

17:00 - 17:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	587	316	869	0.675	583	2.0	12.771	B
2	553	396	537	1.030	509	14.1	79.614	F
3	788	261	728	1.082	710	24.7	91.947	F

17:15 - 17:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	587	320	866	0.677	587	2.1	13.181	B
2	553	398	535	1.032	524	21.4	137.144	F
3	788	268	723	1.090	719	42.1	180.936	F

17:30 - 17:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	479	316	869	0.551	482	1.3	9.627	A
2	451	328	578	0.781	519	4.4	77.276	F
3	644	265	726	0.887	708	26.0	175.666	F

17:45 - 18:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	401	282	892	0.450	403	0.9	7.576	A
2	378	274	611	0.619	389	1.7	17.095	C
3	539	199	771	0.699	633	2.6	41.963	E

Base 2028 + allocated site traffic + dev traffic, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	A680 Rochdale Road / Bury Road roundabout	Mini-roundabout		1, 2, 3	243.93	F

Junction Network Options

Driving side	Lighting	Road surface	In London
Left	Normal/unknown	Normal/unknown	

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D5	Base 2028 + allocated site traffic + dev traffic	AM	ONE HOUR	07:45	09:15	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
1		✓	608	100.000
2		✓	611	100.000
3		✓	578	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		1	2	3
From	1	3	188	417
	2	339	0	272
	3	293	285	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		1	2	3
From	1	0	2	4
	2	5	0	5
	3	6	9	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1	0.77	18.20	3.3	C
2	1.35	658.26	101.5	F
3	0.89	43.38	7.2	E

Main Results for each time segment

07:45 - 08:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	458	212	940	0.487	454	1.0	7.599	A
2	460	314	587	0.784	447	3.4	25.064	D
3	435	250	736	0.591	429	1.5	12.381	B

08:00 - 08:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	547	254	911	0.600	544	1.5	10.080	B
2	549	376	549	1.001	514	12.1	72.559	F
3	520	288	710	0.732	515	2.7	19.314	C

08:15 - 08:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	669	307	876	0.765	663	3.1	16.997	C
2	673	458	500	1.347	497	56.0	264.338	F
3	636	279	716	0.889	622	6.4	36.207	E

08:30 - 08:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	669	312	872	0.768	669	3.3	18.203	C
2	673	462	497	1.353	497	100.0	558.367	F
3	636	279	716	0.889	633	7.2	43.385	E

08:45 - 09:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	547	264	905	0.604	553	1.6	10.776	B
2	549	382	545	1.007	543	101.5	658.258	F
3	520	304	699	0.743	535	3.4	25.310	D

09:00 - 09:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	458	217	936	0.489	460	1.0	7.863	A
2	460	318	584	0.788	578	72.0	542.200	F
3	435	323	686	0.634	441	1.9	16.121	C

Base 2028 + allocated site traffic + dev traffic, PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	A680 Rochdale Road / Bury Road roundabout	Mini-roundabout		1, 2, 3	205.26	F

Junction Network Options

Driving side	Lighting	Road surface	In London
Left	Normal/unknown	Normal/unknown	

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D6	Base 2028 + allocated site traffic + dev traffic	PM	ONE HOUR	16:30	18:00	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
1		✓	542	100.000
2		✓	532	100.000
3		✓	748	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		1	2	3
From	1	5	174	363
	2	288	1	243
	3	438	310	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		1	2	3
From	1	0	0	4
	2	1	0	1
	3	3	2	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1	0.67	12.82	2.1	B
2	1.10	209.02	35.9	F
3	1.16	342.04	67.4	F

Main Results for each time segment

16:30 - 16:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	408	230	928	0.440	405	0.8	7.027	A
2	401	275	610	0.657	393	1.8	16.284	C
3	563	217	758	0.743	552	2.7	17.109	C

16:45 - 17:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	487	271	899	0.542	486	1.2	8.897	A
2	478	330	577	0.829	469	4.1	31.356	D
3	672	259	730	0.922	653	7.7	40.122	E

17:00 - 17:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	597	292	885	0.674	593	2.0	12.506	B
2	586	403	533	1.099	517	21.3	107.851	F
3	824	286	711	1.158	703	37.9	133.014	F

17:15 - 17:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	597	293	884	0.675	597	2.1	12.816	B
2	586	405	531	1.102	527	35.9	209.021	F
3	824	292	707	1.164	706	67.4	281.608	F

17:30 - 17:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	487	285	890	0.547	491	1.3	9.325	A
2	478	333	575	0.832	559	15.7	171.781	F
3	672	308	696	0.966	686	64.1	342.041	F

17:45 - 18:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	408	301	879	0.464	410	0.9	7.887	A
2	401	278	608	0.659	455	2.1	31.343	D
3	563	251	735	0.766	724	23.9	223.430	F

Base 2033 + allocated site traffic + dev traffic, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	A680 Rochdale Road / Bury Road roundabout	Mini-roundabout		1, 2, 3	282.50	F

Junction Network Options

Driving side	Lighting	Road surface	In London
Left	Normal/unknown	Normal/unknown	

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D7	Base 2033 + allocated site traffic + dev traffic	AM	ONE HOUR	07:45	09:15	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
1		✓	620	100.000
2		✓	627	100.000
3		✓	589	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		1	2	3
From	1	3	193	424
	2	347	0	280
	3	297	292	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		1	2	3
From	1	0	2	4
	2	5	0	5
	3	6	9	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1	0.79	19.92	3.6	C
2	1.40	762.73	119.5	F
3	0.90	47.70	8.0	E

Main Results for each time segment

07:45 - 08:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	467	217	936	0.499	463	1.0	7.791	A
2	472	319	583	0.809	457	3.8	27.310	D
3	443	255	733	0.605	437	1.6	12.838	B

08:00 - 08:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	557	260	907	0.614	555	1.6	10.492	B
2	564	382	545	1.034	519	15.0	84.907	F
3	529	290	709	0.747	524	2.9	20.356	C

08:15 - 08:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	683	313	871	0.784	675	3.4	18.345	C
2	690	465	495	1.394	494	64.2	305.848	F
3	649	277	718	0.903	632	7.0	38.913	E

08:30 - 08:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	683	320	867	0.788	682	3.6	19.917	C
2	690	470	493	1.402	492	113.7	637.456	F
3	649	276	718	0.903	645	8.0	47.699	E

08:45 - 09:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	557	271	900	0.620	565	1.7	11.358	B
2	564	389	541	1.042	540	119.5	762.734	F
3	529	302	701	0.756	547	3.6	27.413	D

09:00 - 09:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	467	223	932	0.501	469	1.1	8.091	A
2	472	323	581	0.813	576	93.6	667.801	F
3	443	321	688	0.645	450	2.0	16.679	C

Base 2033 + allocated site traffic + dev traffic, PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Use circulating lanes	Arm order	Junction Delay (s)	Junction LOS
1	A680 Rochdale Road / Bury Road roundabout	Mini-roundabout		1, 2, 3	242.07	F

Junction Network Options

Driving side	Lighting	Road surface	In London
Left	Normal/unknown	Normal/unknown	

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D8	Base 2033 + allocated site traffic + dev traffic	PM	ONE HOUR	16:30	18:00	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
1		✓	551	100.000
2		✓	546	100.000
3		✓	764	100.000

Origin-Destination Data

Demand (PCU/hr)

		To		
		1	2	3
From	1	5	177	369
	2	295	1	250
	3	446	318	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		1	2	3
From	1	0	0	4
	2	1	0	1
	3	3	2	0

Results

Results Summary for whole modelled period

Arm	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
1	0.69	13.33	2.2	B
2	1.14	253.56	44.8	F
3	1.19	398.83	76.7	F

Main Results for each time segment

16:30 - 16:45

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	415	235	924	0.449	412	0.8	7.167	A
2	411	279	607	0.677	403	2.0	17.213	C
3	575	222	755	0.762	563	3.0	18.260	C

16:45 - 17:00

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	495	277	896	0.553	494	1.2	9.146	A
2	491	335	574	0.856	480	4.8	35.141	E
3	687	265	726	0.946	662	9.2	45.755	E

17:00 - 17:15

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	607	294	884	0.686	603	2.2	12.987	B
2	601	409	529	1.137	517	25.7	125.481	F
3	841	286	711	1.182	705	43.2	149.388	F

17:15 - 17:30

Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	607	295	883	0.687	606	2.2	13.330	B
2	601	412	527	1.140	525	44.8	253.562	F
3	841	290	709	1.187	707	76.7	317.685	F

17:30 - 17:45

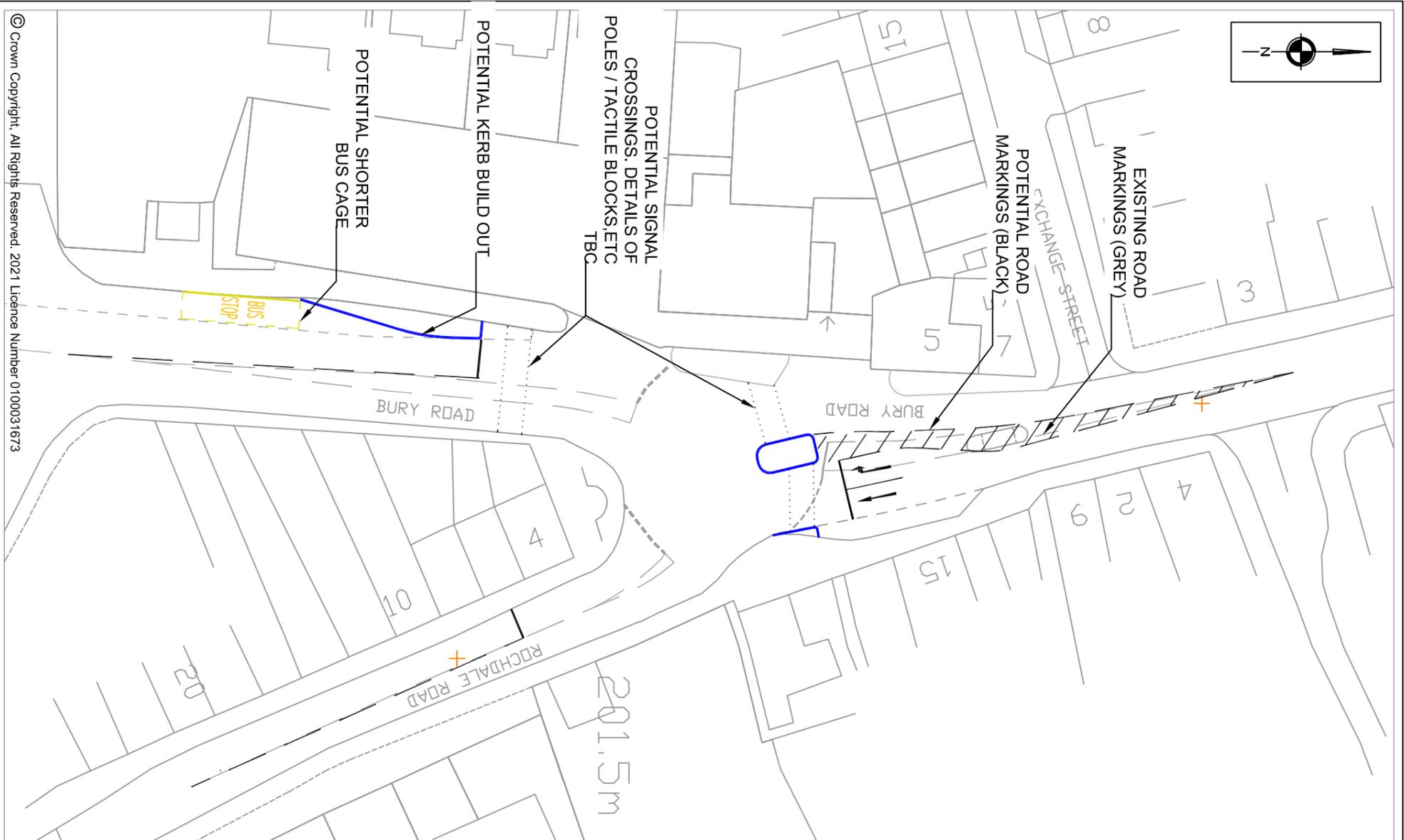
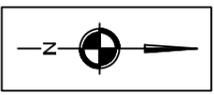
Arm	Total Demand (PCU/hr)	Circulating flow (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
1	495	287	889	0.557	499	1.3	9.557	A
2	491	339	571	0.859	559	27.8	235.964	F
3	687	307	697	0.986	687	76.6	398.828	F

17:45 - 18:00

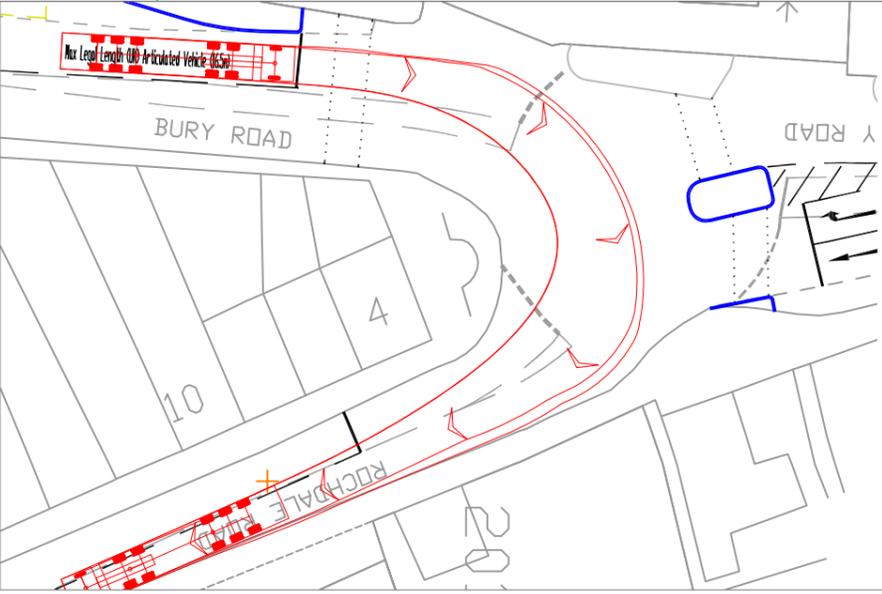
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1	415	294	884	0.469	416	0.9	7.933	A
2	411	283	605	0.679	513	2.4	67.212	F
3	575	282	714	0.805	705	44.2	311.259	F

S|C|P

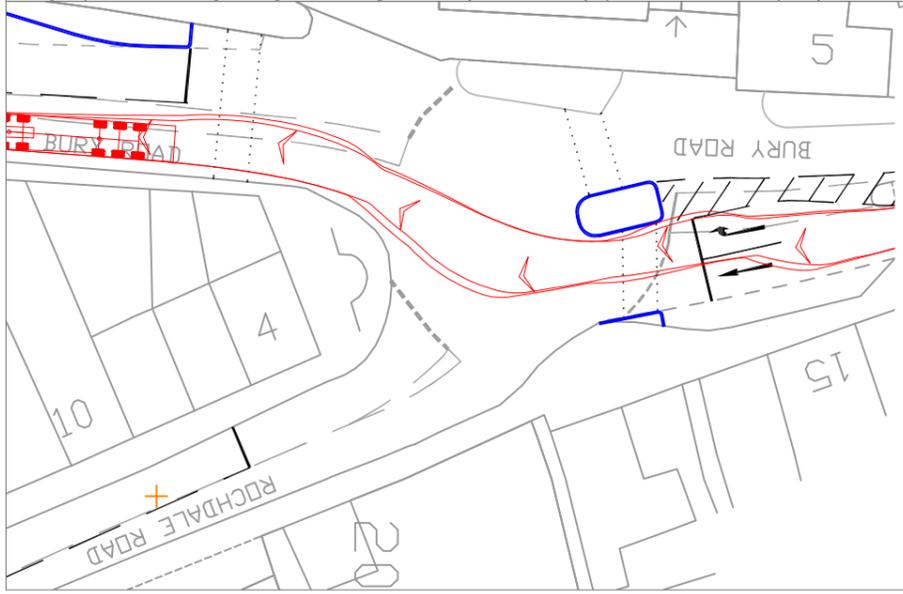
APPENDIX 5



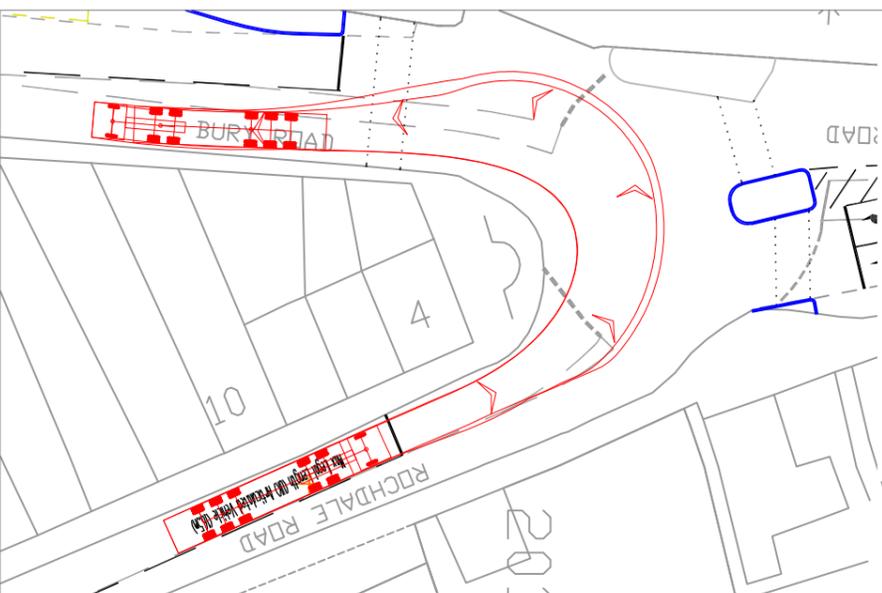
SWEPT PATH ANALYSIS - LARGE ARTICULATED HGV - TURNING RIGHT FROM BURY ROAD



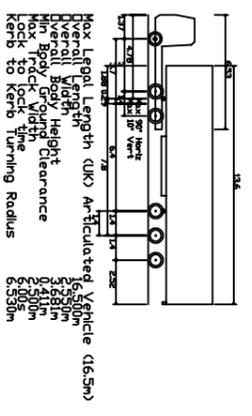
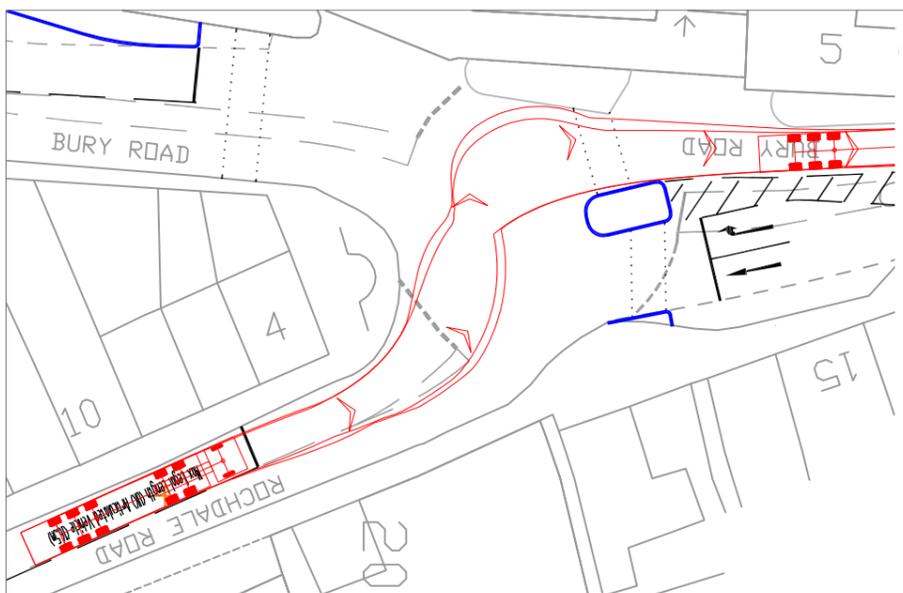
SWEPT PATH ANALYSIS - LARGE ARTICULATED HGV - TURNING RIGHT ONTO BURY ROAD



SWEPT PATH ANALYSIS - LARGE ARTICULATED HGV - TURNING LEFT FROM ROCHDALE ROAD



SWEPT PATH ANALYSIS - LARGE ARTICULATED HGV - TURNING RIGHT FROM ROCHDALE ROAD



NOTES

REVISIONS

REV	DESCRIPTION	DATE	BY
-	-	-	-



Transportation Planning : Infrastructure Design
 Calwyn Chambers, 19 York Street, Manchester, M2 3BA, Tel 0161 832 4400,
 www.scptransport.co.uk, Email info@scptransport.co.uk

Client Name:

Project Title:

BLACKBURN ROAD, EDENFIELD

Drawing Title:
POTENTIAL SIGNAL SCHEME AT THE BURY ROAD / ROCHDALE ROAD JUNCTION

Drawn By: BA Date: 12.10.2021

Checked: GW Scale: 1:500 @ A3

Status: PLANNING Approved/Unapproved:

Drawing No. SCP/210421/D04 Rev. -

S|C|P

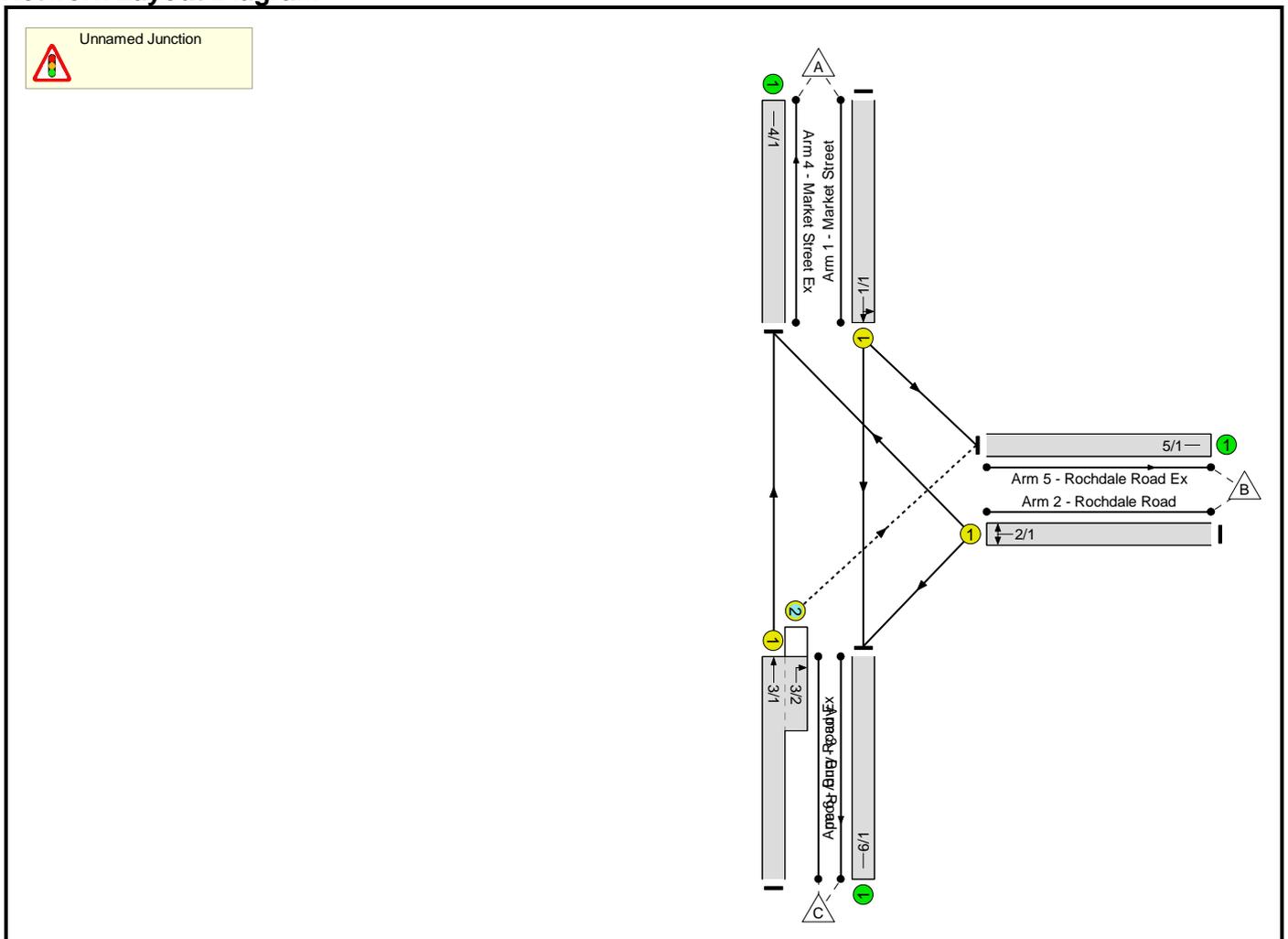
APPENDIX 6

Full Input Data And Results
Full Input Data And Results

User and Project Details

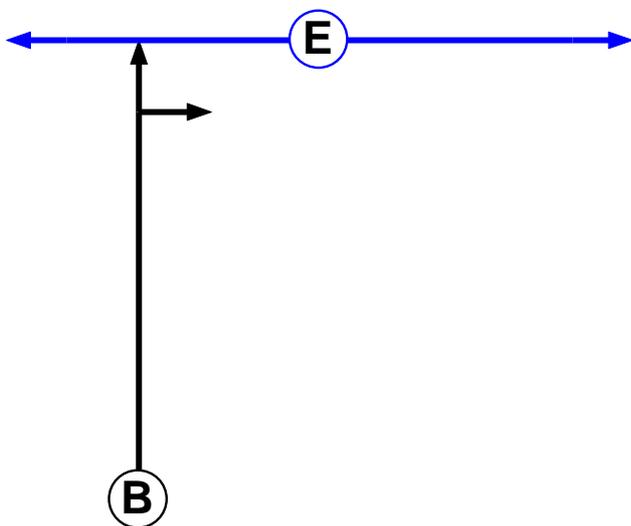
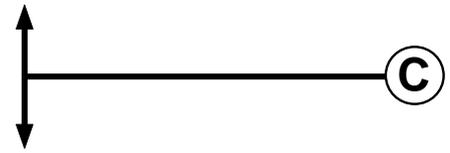
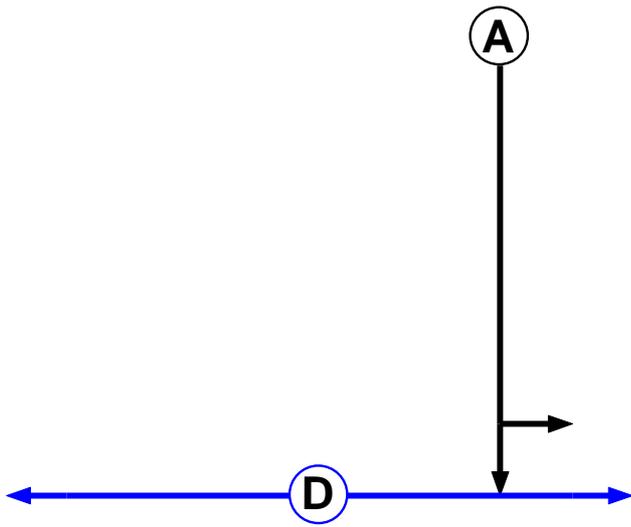
Project:	
Title:	
Location:	
File name:	Bury Road_Rochdale Road_Market Street_Feasibility_v2_no peds.lsg3x
Author:	
Company:	
Address:	
Notes:	

Network Layout Diagram



Full Input Data And Results

Phase Diagram



Phase Input Data

Phase Name	Phase Type	Assoc. Phase	Street Min	Cont Min
A	Traffic		7	7
B	Traffic		7	7
C	Traffic		7	7
D	Pedestrian		5	5
E	Pedestrian		5	5

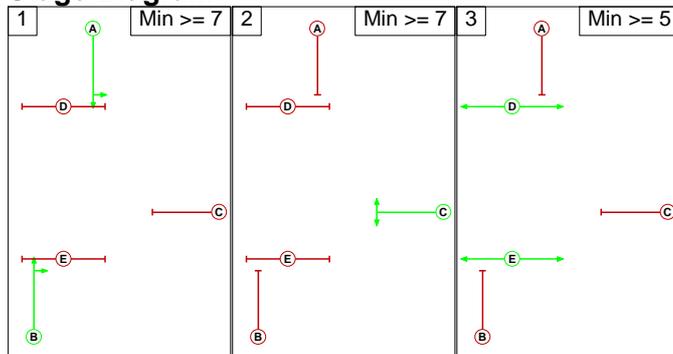
Phase Intergreens Matrix

		Starting Phase				
		A	B	C	D	E
Terminating Phase	A	-		5	6	6
	B		-	5	6	6
	C	6	6	-	6	6
	D	6	6	6	-	
	E	6	6	6		-

Phases in Stage

Stage No.	Phases in Stage
1	A B
2	C
3	D E

Stage Diagram



Phase Delays

Term. Stage	Start Stage	Phase	Type	Value	Cont value
There are no Phase Delays defined					

Full Input Data And Results

Prohibited Stage Change

From Stage	To Stage		
	1	2	3
1			
2			
3			

Full Input Data And Results

Give-Way Lane Input Data

Junction: Unnamed Junction											
Lane	Movement	Max Flow when Giving Way (PCU/Hr)	Min Flow when Giving Way (PCU/Hr)	Opposing Lane	Opp. Lane Coeff.	Opp. Mvmnts.	Right Turn Storage (PCU)	Non-Blocking Storage (PCU)	RTF	Right Turn Move up (s)	Max Turns in Intergreen (PCU)
3/2 (Bury Road)	5/1 (Right)	1439	0	1/1	1.09	All	2.00	-	0.50	2	2.00

Full Input Data And Results

Lane Input Data

Junction: Unnamed Junction												
Lane	Lane Type	Phases	Start Disp.	End Disp.	Physical Length (PCU)	Sat Flow Type	Def User Saturation Flow (PCU/Hr)	Lane Width (m)	Gradient	Nearside Lane	Turns	Turning Radius (m)
1/1 (Market Street)	U	A	2	3	60.0	Geom	-	5.00	0.00	Y	Arm 5 Left	25.00
											Arm 6 Ahead	Inf
2/1 (Rochdale Road)	U	C	2	3	60.0	Geom	-	3.00	0.00	Y	Arm 4 Right	10.00
											Arm 6 Left	8.00
3/1 (Bury Road)	U	B	2	3	60.0	Geom	-	3.00	0.00	Y	Arm 4 Ahead	Inf
3/2 (Bury Road)	O	B	2	3	5.0	Geom	-	3.00	0.00	N	Arm 5 Right	11.00
4/1 (Market Street Ex)	U		2	3	60.0	Inf	-	-	-	-	-	-
5/1 (Rochdale Road Ex)	U		2	3	60.0	Inf	-	-	-	-	-	-
6/1 (Bury Road Ex)	U		2	3	60.0	Inf	-	-	-	-	-	-

Traffic Flow Groups

Flow Group	Start Time	End Time	Duration	Formula
1: 'Base 2028 + Allocated Site AM'	08:00	09:00	01:00	
2: 'Base 2028 + Allocated Site PM'	16:45	17:45	01:00	
3: 'Base 2033 + Allocated Site AM'	08:00	09:00	01:00	
4: 'Base 2033 + Allocated Site PM'	16:45	17:45	01:00	
5: 'Base 2028 + Allocated Site + dev AM'	08:00	09:00	01:00	
6: 'Base 2028 + Allocated Site + dev PM'	16:45	17:45	01:00	
7: 'Base 2033 + Allocated Site + dev AM'	08:00	09:00	01:00	
8: 'Base 2033 + Allocated Site + dev PM'	16:45	17:45	01:00	

Scenario 1: 'Base 2028 + Allocated Site AM' (FG1: 'Base 2028 + Allocated Site AM', Plan 1: 'Network Control Plan 1')

Traffic Flows, Desired

Desired Flow :

	Destination				
	A	B	C	Tot.	
Origin	A	0	162	373	535
	B	323	0	272	595
	C	285	285	0	570
	Tot.	608	447	645	1700

Traffic Lane Flows

Lane	Scenario 1: Base 2028 + Allocated Site AM
Junction: Unnamed Junction	
1/1	535
2/1	595
3/1 (with short)	570(In) 285(Out)
3/2 (short)	285
4/1	608
5/1	447
6/1	645

Lane Saturation Flows

Junction: Unnamed Junction								
Lane	Lane Width (m)	Gradient	Nearside Lane	Allowed Turns	Turning Radius (m)	Turning Prop.	Sat Flow (PCU/Hr)	Flared Sat Flow (PCU/Hr)
1/1 (Market Street)	5.00	0.00	Y	Arm 5 Left	25.00	30.3 %	2077	2077
				Arm 6 Ahead	Inf	69.7 %		
2/1 (Rochdale Road)	3.00	0.00	Y	Arm 4 Right	10.00	54.3 %	1641	1641
				Arm 6 Left	8.00	45.7 %		
3/1 (Bury Road)	3.00	0.00	Y	Arm 4 Ahead	Inf	100.0 %	1915	1915
3/2 (Bury Road)	3.00	0.00	N	Arm 5 Right	11.00	100.0 %	1808	1808
4/1 (Market Street Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
5/1 (Rochdale Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
6/1 (Bury Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf

Scenario 2: 'Base 2028 + Allocated Site PM' (FG2: 'Base 2028 + Allocated Site PM', Plan 1: 'Network Control Plan 1')

Traffic Flows, Desired

Desired Flow :

	Destination				
		A	B	C	Tot.
Origin	A	0	168	352	520
	B	244	0	243	487
	C	390	310	0	700
	Tot.	634	478	595	1707

Traffic Lane Flows

Lane	Scenario 2: Base 2028 + Allocated Site PM
Junction: Unnamed Junction	
1/1	520
2/1	487
3/1 (with short)	700(In) 390(Out)
3/2 (short)	310
4/1	634
5/1	478
6/1	595

Lane Saturation Flows

Junction: Unnamed Junction								
Lane	Lane Width (m)	Gradient	Nearside Lane	Allowed Turns	Turning Radius (m)	Turning Prop.	Sat Flow (PCU/Hr)	Flared Sat Flow (PCU/Hr)
1/1 (Market Street)	5.00	0.00	Y	Arm 5 Left	25.00	32.3 %	2075	2075
				Arm 6 Ahead	Inf	67.7 %		
2/1 (Rochdale Road)	3.00	0.00	Y	Arm 4 Right	10.00	50.1 %	1639	1639
				Arm 6 Left	8.00	49.9 %		
3/1 (Bury Road)	3.00	0.00	Y	Arm 4 Ahead	Inf	100.0 %	1915	1915
3/2 (Bury Road)	3.00	0.00	N	Arm 5 Right	11.00	100.0 %	1808	1808
4/1 (Market Street Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
5/1 (Rochdale Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
6/1 (Bury Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf

Scenario 3: 'Base 2033 + Allocated Site AM' (FG3: 'Base 2033 + Allocated Site AM', Plan 1: 'Network Control Plan 1')

Traffic Flows, Desired

Desired Flow :

	Destination				
		A	B	C	Tot.
Origin	A	0	166	380	546
	B	331	0	280	611
	C	289	292	0	581
	Tot.	620	458	660	1738

Traffic Lane Flows

Lane	Scenario 3: Base 2033 + Allocated Site AM
Junction: Unnamed Junction	
1/1	546
2/1	611
3/1 (with short)	581(In) 289(Out)
3/2 (short)	292
4/1	620
5/1	458
6/1	660

Lane Saturation Flows

Junction: Unnamed Junction								
Lane	Lane Width (m)	Gradient	Nearside Lane	Allowed Turns	Turning Radius (m)	Turning Prop.	Sat Flow (PCU/Hr)	Flared Sat Flow (PCU/Hr)
1/1 (Market Street)	5.00	0.00	Y	Arm 5 Left	25.00	30.4 %	2077	2077
				Arm 6 Ahead	Inf	69.6 %		
2/1 (Rochdale Road)	3.00	0.00	Y	Arm 4 Right	10.00	54.2 %	1641	1641
				Arm 6 Left	8.00	45.8 %		
3/1 (Bury Road)	3.00	0.00	Y	Arm 4 Ahead	Inf	100.0 %	1915	1915
3/2 (Bury Road)	3.00	0.00	N	Arm 5 Right	11.00	100.0 %	1808	1808
4/1 (Market Street Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
5/1 (Rochdale Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
6/1 (Bury Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf

Scenario 4: 'Base 2033 + Allocated Site PM' (FG4: 'Base 2033 + Allocated Site PM', Plan 1: 'Network Control Plan 1')

Traffic Flows, Desired

Desired Flow :

	Destination				
		A	B	C	Tot.
Origin	A	0	171	357	528
	B	251	0	250	501
	C	398	318	0	716
	Tot.	649	489	607	1745

Traffic Lane Flows

Lane	Scenario 4: Base 2033 + Allocated Site PM
Junction: Unnamed Junction	
1/1	528
2/1	501
3/1 (with short)	716(In) 398(Out)
3/2 (short)	318
4/1	649
5/1	489
6/1	607

Lane Saturation Flows

Junction: Unnamed Junction								
Lane	Lane Width (m)	Gradient	Nearside Lane	Allowed Turns	Turning Radius (m)	Turning Prop.	Sat Flow (PCU/Hr)	Flared Sat Flow (PCU/Hr)
1/1 (Market Street)	5.00	0.00	Y	Arm 5 Left	25.00	32.4 %	2075	2075
				Arm 6 Ahead	Inf	67.6 %		
2/1 (Rochdale Road)	3.00	0.00	Y	Arm 4 Right	10.00	50.1 %	1639	1639
				Arm 6 Left	8.00	49.9 %		
3/1 (Bury Road)	3.00	0.00	Y	Arm 4 Ahead	Inf	100.0 %	1915	1915
3/2 (Bury Road)	3.00	0.00	N	Arm 5 Right	11.00	100.0 %	1808	1808
4/1 (Market Street Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
5/1 (Rochdale Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
6/1 (Bury Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf

Scenario 5: 'Base 2028 + Allocated Site + dev AM' (FG5: 'Base 2028 + Allocated Site + dev AM', Plan 1: 'Network Control Plan 1')

Traffic Flows, Desired

Desired Flow :

	Destination				
		A	B	C	Tot.
Origin	A	0	188	417	605
	B	339	0	272	611
	C	293	285	0	578
	Tot.	632	473	689	1794

Traffic Lane Flows

Lane	Scenario 5: Base 2028 + Allocated Site + dev AM
Junction: Unnamed Junction	
1/1	605
2/1	611
3/1 (with short)	578(In) 293(Out)
3/2 (short)	285
4/1	632
5/1	473
6/1	689

Lane Saturation Flows

Junction: Unnamed Junction								
Lane	Lane Width (m)	Gradient	Nearside Lane	Allowed Turns	Turning Radius (m)	Turning Prop.	Sat Flow (PCU/Hr)	Flared Sat Flow (PCU/Hr)
1/1 (Market Street)	5.00	0.00	Y	Arm 5 Left	25.00	31.1 %	2076	2076
				Arm 6 Ahead	Inf	68.9 %		
2/1 (Rochdale Road)	3.00	0.00	Y	Arm 4 Right	10.00	55.5 %	1641	1641
				Arm 6 Left	8.00	44.5 %		
3/1 (Bury Road)	3.00	0.00	Y	Arm 4 Ahead	Inf	100.0 %	1915	1915
3/2 (Bury Road)	3.00	0.00	N	Arm 5 Right	11.00	100.0 %	1808	1808
4/1 (Market Street Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
5/1 (Rochdale Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
6/1 (Bury Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf

Scenario 6: 'Base 2028 + Allocated Site + dev PM' (FG6: 'Base 2028 + Allocated Site + dev PM', Plan 1: 'Network Control Plan 1')

Traffic Flows, Desired

Desired Flow :

	Destination				
		A	B	C	Tot.
Origin	A	0	174	363	537
	B	288	0	243	531
	C	438	310	0	748
	Tot.	726	484	606	1816

Traffic Lane Flows

Lane	Scenario 6: Base 2028 + Allocated Site + dev PM
Junction: Unnamed Junction	
1/1	537
2/1	531
3/1 (with short)	748(In) 438(Out)
3/2 (short)	310
4/1	726
5/1	484
6/1	606

Full Input Data And Results

Lane Saturation Flows

Junction: Unnamed Junction								
Lane	Lane Width (m)	Gradient	Nearside Lane	Allowed Turns	Turning Radius (m)	Turning Prop.	Sat Flow (PCU/Hr)	Flared Sat Flow (PCU/Hr)
1/1 (Market Street)	5.00	0.00	Y	Arm 5 Left	25.00	32.4 %	2075	2075
				Arm 6 Ahead	Inf	67.6 %		
2/1 (Rochdale Road)	3.00	0.00	Y	Arm 4 Right	10.00	54.2 %	1641	1641
				Arm 6 Left	8.00	45.8 %		
3/1 (Bury Road)	3.00	0.00	Y	Arm 4 Ahead	Inf	100.0 %	1915	1915
3/2 (Bury Road)	3.00	0.00	N	Arm 5 Right	11.00	100.0 %	1808	1808
4/1 (Market Street Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
5/1 (Rochdale Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
6/1 (Bury Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf

Scenario 7: 'Base 2033 + Allocated Site + dev AM' (FG7: 'Base 2033 + Allocated Site + dev AM', Plan 1: 'Network Control Plan 1')

Traffic Flows, Desired

Desired Flow :

	Destination				
		A	B	C	Tot.
Origin	A	0	193	424	617
	B	347	0	280	627
	C	297	292	0	589
	Tot.	644	485	704	1833

Traffic Lane Flows

Lane	Scenario 7: Base 2033 + Allocated Site + dev AM
Junction: Unnamed Junction	
1/1	617
2/1	627
3/1 (with short)	589(In) 297(Out)
3/2 (short)	292
4/1	644
5/1	485
6/1	704

Lane Saturation Flows

Junction: Unnamed Junction								
Lane	Lane Width (m)	Gradient	Nearside Lane	Allowed Turns	Turning Radius (m)	Turning Prop.	Sat Flow (PCU/Hr)	Flared Sat Flow (PCU/Hr)
1/1 (Market Street)	5.00	0.00	Y	Arm 5 Left	25.00	31.3 %	2076	2076
				Arm 6 Ahead	Inf	68.7 %		
2/1 (Rochdale Road)	3.00	0.00	Y	Arm 4 Right	10.00	55.3 %	1641	1641
				Arm 6 Left	8.00	44.7 %		
3/1 (Bury Road)	3.00	0.00	Y	Arm 4 Ahead	Inf	100.0 %	1915	1915
3/2 (Bury Road)	3.00	0.00	N	Arm 5 Right	11.00	100.0 %	1808	1808
4/1 (Market Street Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
5/1 (Rochdale Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
6/1 (Bury Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf

Scenario 8: 'Base 2033 + Allocated Site + dev PM' (FG8: 'Base 2033 + Allocated Site + dev PM', Plan 1: 'Network Control Plan 1')

Traffic Flows, Desired

Desired Flow :

	Destination				
		A	B	C	Tot.
Origin	A	0	177	369	546
	B	295	0	250	545
	C	446	318	0	764
	Tot.	741	495	619	1855

Traffic Lane Flows

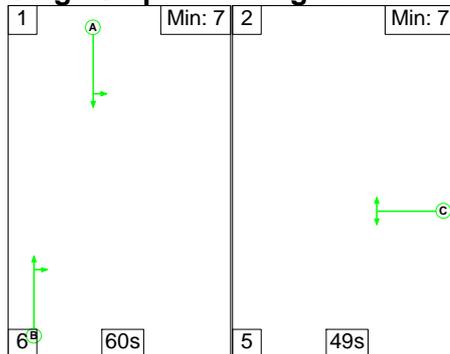
Lane	Scenario 8: Base 2033 + Allocated Site + dev PM
Junction: Unnamed Junction	
1/1	546
2/1	545
3/1 (with short)	764(In) 446(Out)
3/2 (short)	318
4/1	741
5/1	495
6/1	619

Lane Saturation Flows

Junction: Unnamed Junction								
Lane	Lane Width (m)	Gradient	Nearside Lane	Allowed Turns	Turning Radius (m)	Turning Prop.	Sat Flow (PCU/Hr)	Flared Sat Flow (PCU/Hr)
1/1 (Market Street)	5.00	0.00	Y	Arm 5 Left	25.00	32.4 %	2075	2075
				Arm 6 Ahead	Inf	67.6 %		
2/1 (Rochdale Road)	3.00	0.00	Y	Arm 4 Right	10.00	54.1 %	1641	1641
				Arm 6 Left	8.00	45.9 %		
3/1 (Bury Road)	3.00	0.00	Y	Arm 4 Ahead	Inf	100.0 %	1915	1915
3/2 (Bury Road)	3.00	0.00	N	Arm 5 Right	11.00	100.0 %	1808	1808
4/1 (Market Street Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
5/1 (Rochdale Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf
6/1 (Bury Road Ex Lane 1)	Infinite Saturation Flow						Inf	Inf

Scenario 1: 'Base 2028 + Allocated Site AM' (FG1: 'Base 2028 + Allocated Site AM', Plan 1: 'Network Control Plan 1')

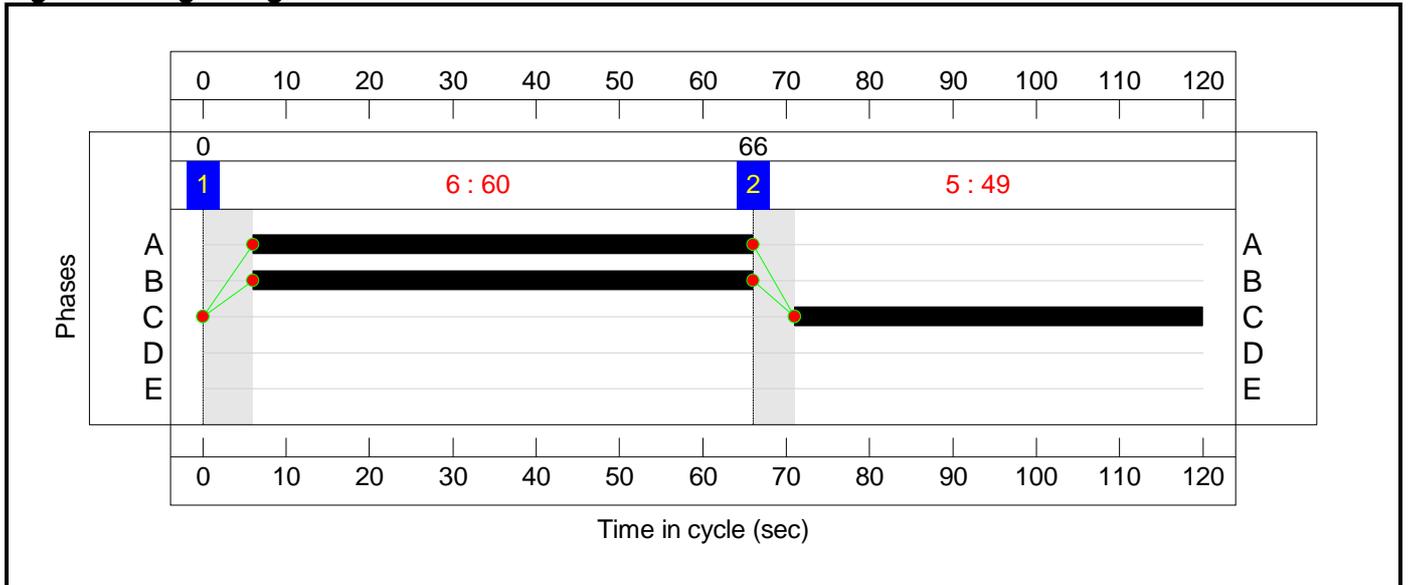
Stage Sequence Diagram



Stage Timings

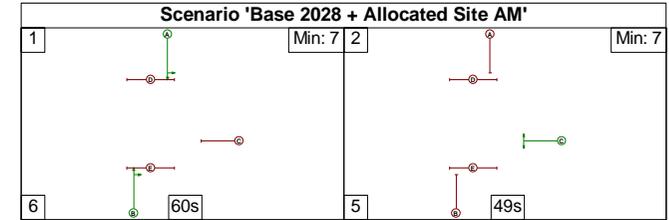
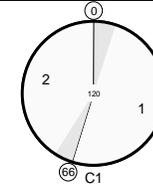
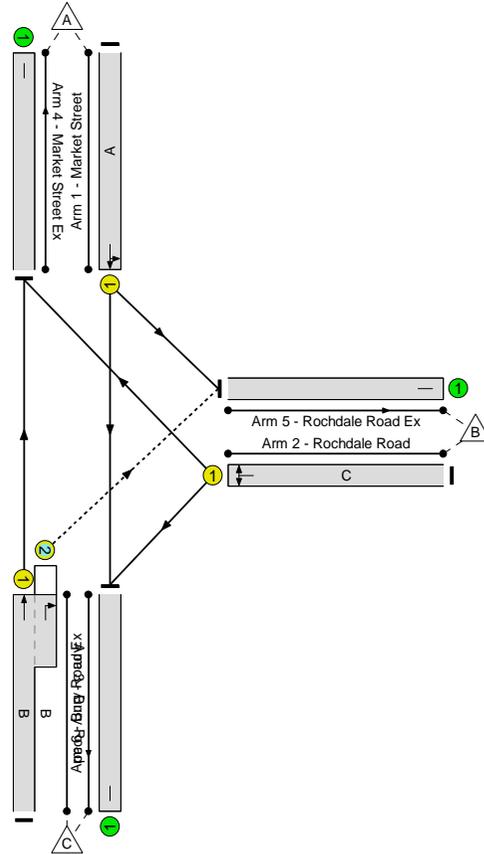
Stage	1	2
Duration	60	49
Change Point	0	66

Signal Timings Diagram



Full Input Data And Results
Network Layout Diagram

Unnamed Junction
 PRC: 3.4 %
 Total Traffic Delay: 19.2 pcuHr



Full Input Data And Results

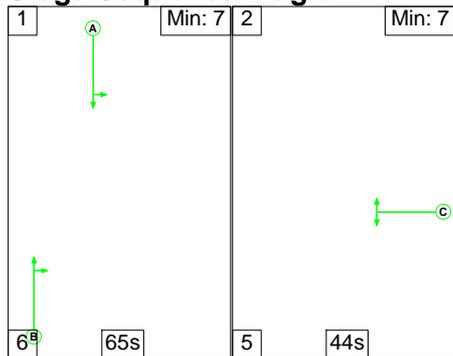
Network Results

Item	Lane Description	Lane Type	Controller Stream	Position In Filtered Route	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)
Network	-	-	N/A	-	-		-	-	-	-	-	-	87.0%
Unnamed Junction	-	-	N/A	-	-		-	-	-	-	-	-	87.0%
1/1	Market Street Left Ahead	U	N/A	N/A	A		1	60	-	535	2077	1056	50.7%
2/1	Rochdale Road Right Left	U	N/A	N/A	C		1	49	-	595	1641	684	87.0%
3/1+3/2	Bury Road Ahead Right	U+O	N/A	N/A	B		1	60	-	570	1915:1808	332+332	86.0 : 86.0%
4/1	Market Street Ex	U	N/A	N/A	-		-	-	-	608	Inf	Inf	0.0%
5/1	Rochdale Road Ex	U	N/A	N/A	-		-	-	-	447	Inf	Inf	0.0%
6/1	Bury Road Ex	U	N/A	N/A	-		-	-	-	645	Inf	Inf	0.0%
Item	Arriving (pcu)	Leaving (pcu)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Uniform Delay (pcuHr)	Rand + Oversat Delay (pcuHr)	Storage Area Uniform Delay (pcuHr)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Max. Back of Uniform Queue (pcu)	Rand + Oversat Queue (pcu)	Mean Max Queue (pcu)
Network	-	-	285	0	0	12.0	6.5	0.8	19.2	-	-	-	-
Unnamed Junction	-	-	285	0	0	12.0	6.5	0.8	19.2	-	-	-	-
1/1	535	535	-	-	-	2.9	0.5	-	3.4	23.0	11.7	0.5	12.3
2/1	595	595	-	-	-	5.3	3.1	-	8.4	51.0	18.0	3.1	21.1
3/1+3/2	570	570	285	0	0	3.8	2.9	0.8	7.4	46.8	8.7	2.9	11.6
4/1	608	608	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
5/1	447	447	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
6/1	645	645	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
C1			PRC for Signalled Lanes (%):		3.4	Total Delay for Signalled Lanes (pcuHr):		19.24	Cycle Time (s): 120				
			PRC Over All Lanes (%):		3.4	Total Delay Over All Lanes(pcuHr):		19.24					

Full Input Data And Results

Scenario 2: 'Base 2028 + Allocated Site PM' (FG2: 'Base 2028 + Allocated Site PM', Plan 1: 'Network Control Plan 1')

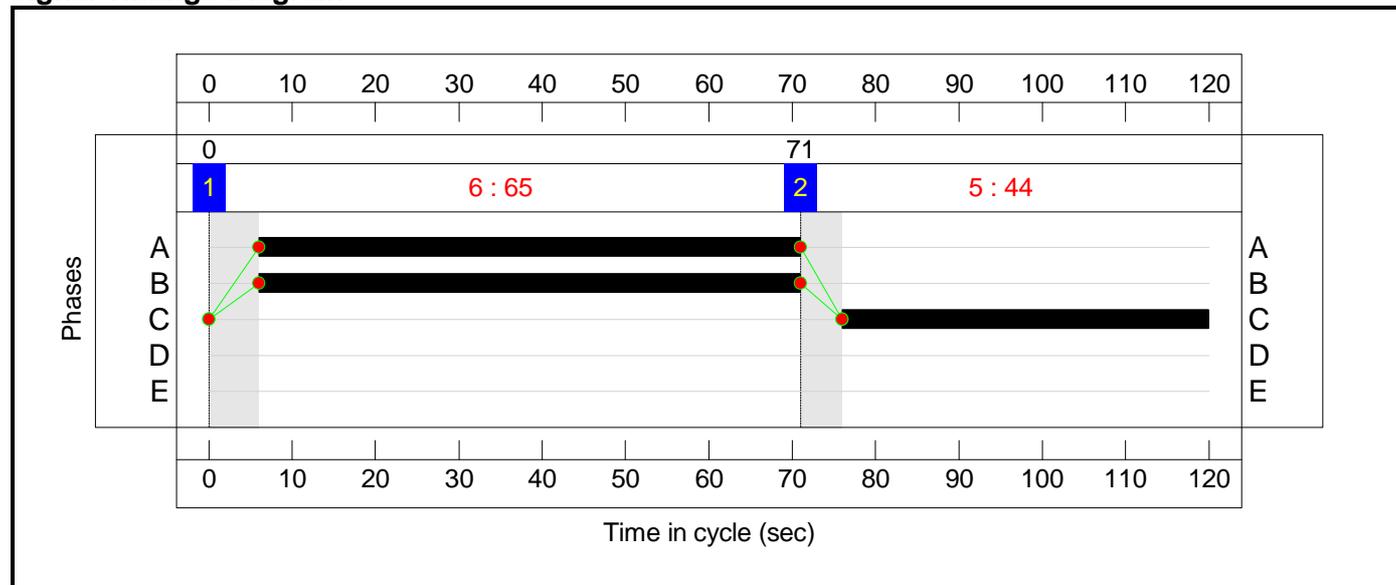
Stage Sequence Diagram



Stage Timings

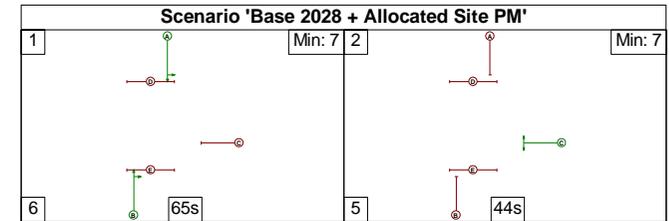
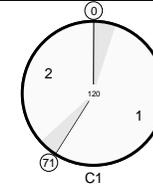
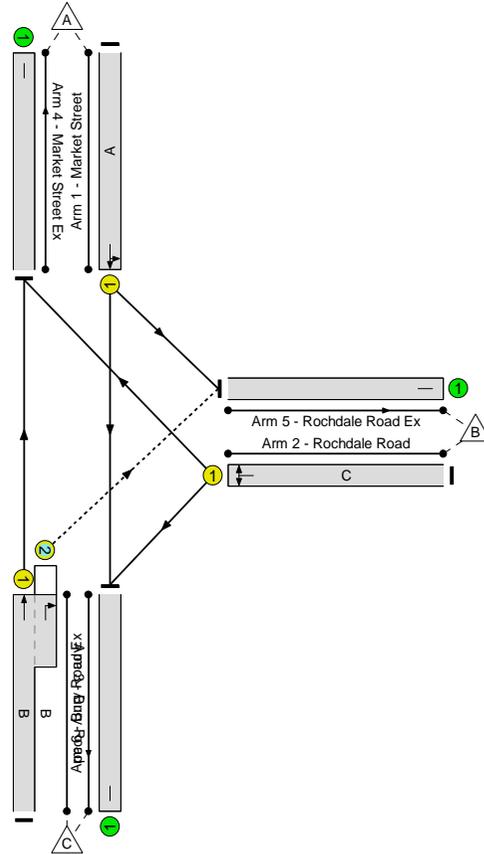
Stage	1	2
Duration	65	44
Change Point	0	71

Signal Timings Diagram



Full Input Data And Results
Network Layout Diagram

Unnamed Junction
 PRC: 13.6 %
 Total Traffic Delay: 15.5 pcuHr



Full Input Data And Results

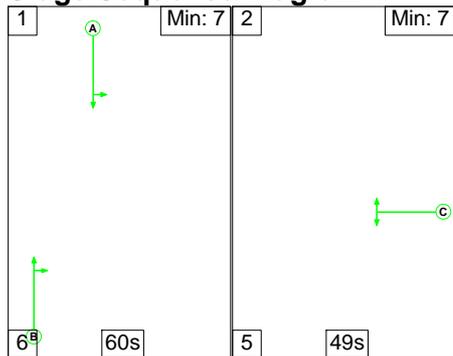
Network Results

Item	Lane Description	Lane Type	Controller Stream	Position In Filtered Route	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)
Network	-	-	N/A	-	-		-	-	-	-	-	-	79.2%
Unnamed Junction	-	-	N/A	-	-		-	-	-	-	-	-	79.2%
1/1	Market Street Left Ahead	U	N/A	N/A	A		1	65	-	520	2075	1141	45.6%
2/1	Rochdale Road Right Left	U	N/A	N/A	C		1	44	-	487	1639	615	79.2%
3/1+3/2	Bury Road Ahead Right	U+O	N/A	N/A	B		1	65	-	700	1915:1808	495+393	78.8 : 78.8%
4/1	Market Street Ex	U	N/A	N/A	-		-	-	-	634	Inf	Inf	0.0%
5/1	Rochdale Road Ex	U	N/A	N/A	-		-	-	-	478	Inf	Inf	0.0%
6/1	Bury Road Ex	U	N/A	N/A	-		-	-	-	595	Inf	Inf	0.0%
Item	Arriving (pcu)	Leaving (pcu)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Uniform Delay (pcuHr)	Rand + Oversat Delay (pcuHr)	Storage Area Uniform Delay (pcuHr)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Max. Back of Uniform Queue (pcu)	Rand + Oversat Queue (pcu)	Mean Max Queue (pcu)
Network	-	-	310	0	0	10.7	4.1	0.7	15.5	-	-	-	-
Unnamed Junction	-	-	310	0	0	10.7	4.1	0.7	15.5	-	-	-	-
1/1	520	520	-	-	-	2.3	0.4	-	2.8	19.1	10.4	0.4	10.8
2/1	487	487	-	-	-	4.5	1.9	-	6.4	47.1	14.3	1.9	16.2
3/1+3/2	700	700	310	0	0	3.9	1.8	0.7	6.4	33.0	10.2	1.8	12.0
4/1	634	634	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
5/1	478	478	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
6/1	595	595	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
C1			PRC for Signalled Lanes (%):		13.6	Total Delay for Signalled Lanes (pcuHr):			15.55	Cycle Time (s): 120			
			PRC Over All Lanes (%):		13.6	Total Delay Over All Lanes(pcuHr):			15.55				

Full Input Data And Results

Scenario 3: 'Base 2033 + Allocated Site AM' (FG3: 'Base 2033 + Allocated Site AM', Plan 1: 'Network Control Plan 1')

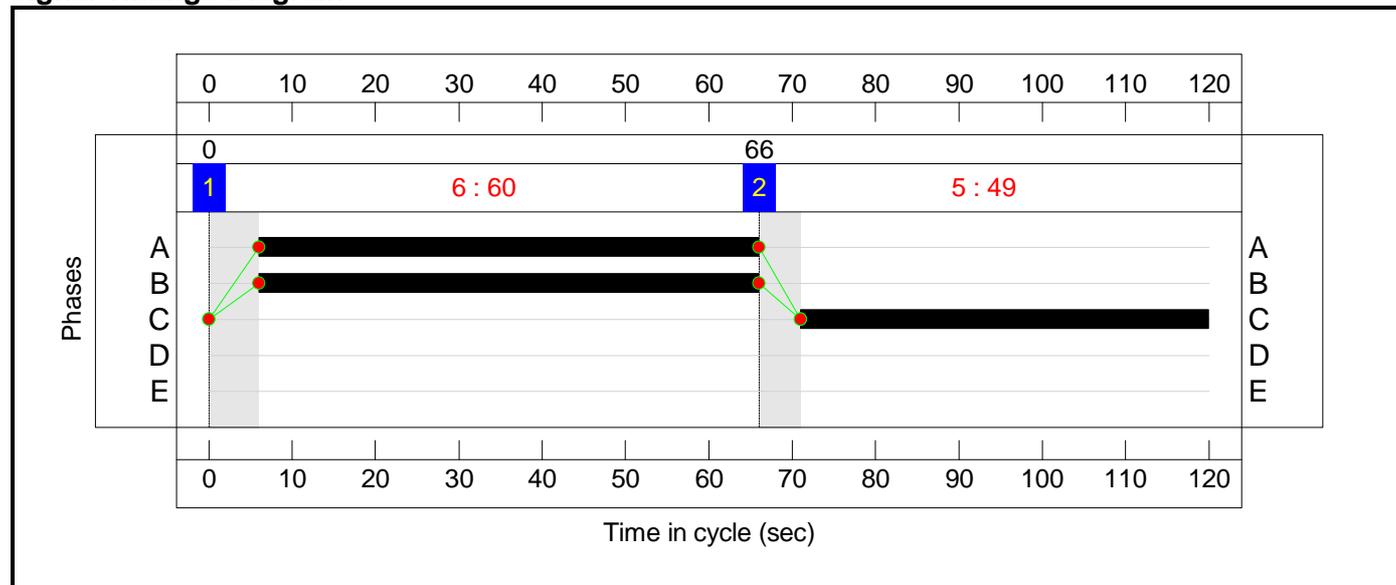
Stage Sequence Diagram



Stage Timings

Stage	1	2
Duration	60	49
Change Point	0	66

Signal Timings Diagram



Full Input Data And Results

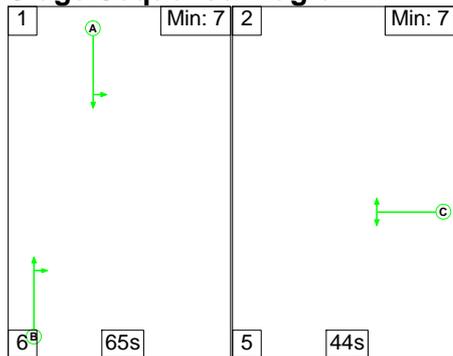
Network Results

Item	Lane Description	Lane Type	Controller Stream	Position In Filtered Route	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)
Network	-	-	N/A	-	-		-	-	-	-	-	-	89.4%
Unnamed Junction	-	-	N/A	-	-		-	-	-	-	-	-	89.4%
1/1	Market Street Left Ahead	U	N/A	N/A	A		1	60	-	546	2077	1056	51.7%
2/1	Rochdale Road Right Left	U	N/A	N/A	C		1	49	-	611	1641	684	89.4%
3/1+3/2	Bury Road Ahead Right	U+O	N/A	N/A	B		1	60	-	581	1915:1808	323+327	89.4 : 89.4%
4/1	Market Street Ex	U	N/A	N/A	-		-	-	-	620	Inf	Inf	0.0%
5/1	Rochdale Road Ex	U	N/A	N/A	-		-	-	-	458	Inf	Inf	0.0%
6/1	Bury Road Ex	U	N/A	N/A	-		-	-	-	660	Inf	Inf	0.0%
Item	Arriving (pcu)	Leaving (pcu)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Uniform Delay (pcuHr)	Rand + Oversat Delay (pcuHr)	Storage Area Uniform Delay (pcuHr)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Max. Back of Uniform Queue (pcu)	Rand + Oversat Queue (pcu)	Mean Max Queue (pcu)
Network	-	-	281	0	11	12.4	8.1	0.8	21.4	-	-	-	-
Unnamed Junction	-	-	281	0	11	12.4	8.1	0.8	21.4	-	-	-	-
1/1	546	546	-	-	-	3.0	0.5	-	3.5	23.2	12.1	0.5	12.7
2/1	611	611	-	-	-	5.5	3.8	-	9.3	54.9	18.8	3.8	22.6
3/1+3/2	581	581	281	0	11	3.9	3.8	0.8	8.5	52.7	9.1	3.8	12.9
4/1	620	620	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
5/1	458	458	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
6/1	660	660	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
C1			PRC for Signalled Lanes (%):		0.7	Total Delay for Signalled Lanes (pcuHr):		21.35	Cycle Time (s):		120		
			PRC Over All Lanes (%):		0.7	Total Delay Over All Lanes(pcuHr):		21.35					

Full Input Data And Results

Scenario 4: 'Base 2033 + Allocated Site PM' (FG4: 'Base 2033 + Allocated Site PM', Plan 1: 'Network Control Plan 1')

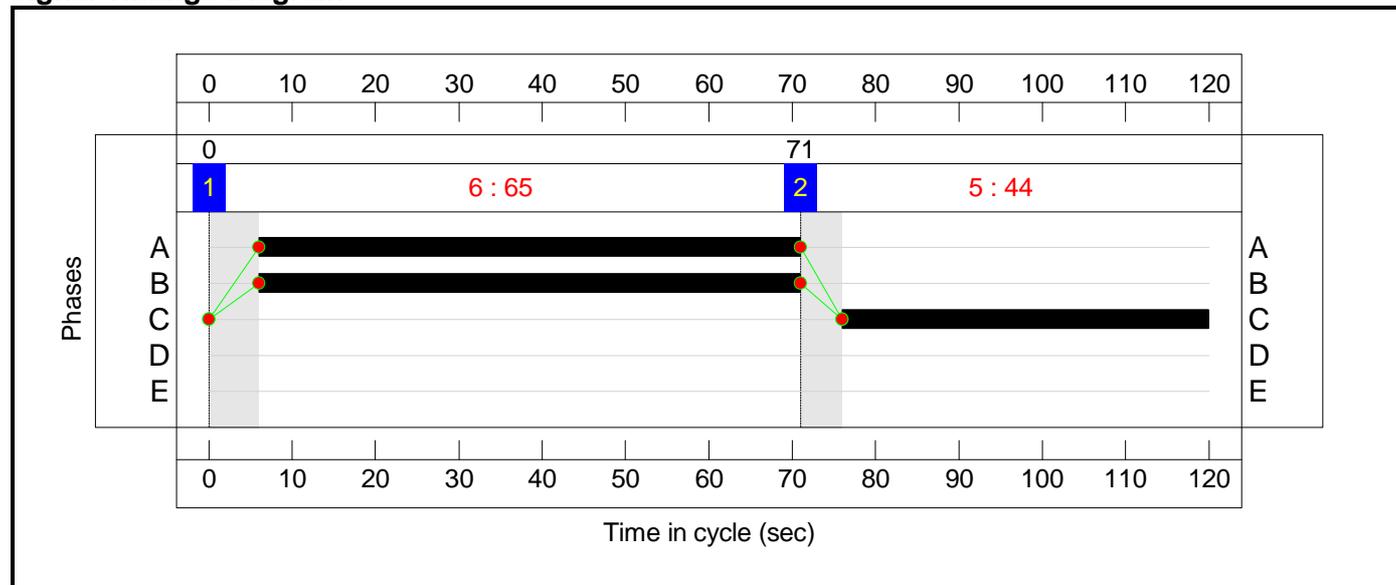
Stage Sequence Diagram



Stage Timings

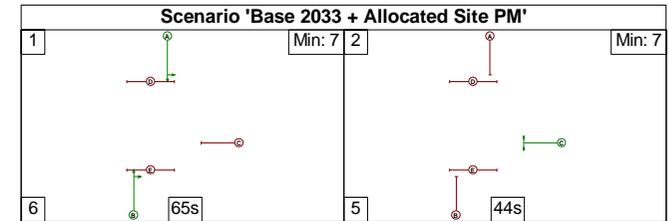
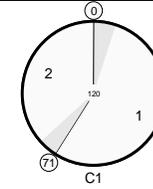
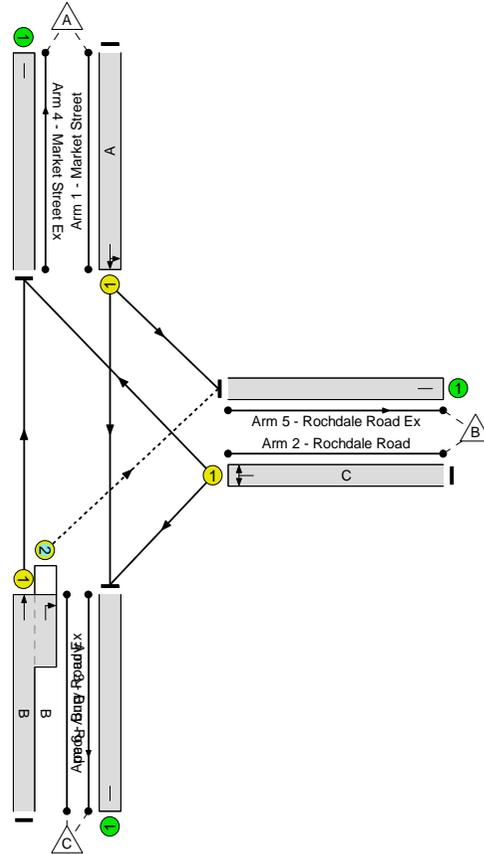
Stage	1	2
Duration	65	44
Change Point	0	71

Signal Timings Diagram



Full Input Data And Results
Network Layout Diagram

Unnamed Junction
 PRC: 8.9 %
 Total Traffic Delay: 16.8 pcuHr



Full Input Data And Results

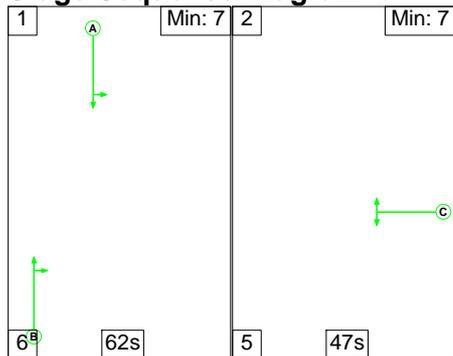
Network Results

Item	Lane Description	Lane Type	Controller Stream	Position In Filtered Route	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)
Network	-	-	N/A	-	-		-	-	-	-	-	-	82.6%
Unnamed Junction	-	-	N/A	-	-		-	-	-	-	-	-	82.6%
1/1	Market Street Left Ahead	U	N/A	N/A	A		1	65	-	528	2075	1141	46.3%
2/1	Rochdale Road Right Left	U	N/A	N/A	C		1	44	-	501	1639	615	81.5%
3/1+3/2	Bury Road Ahead Right	U+O	N/A	N/A	B		1	65	-	716	1915:1808	482+385	82.6 : 82.6%
4/1	Market Street Ex	U	N/A	N/A	-		-	-	-	649	Inf	Inf	0.0%
5/1	Rochdale Road Ex	U	N/A	N/A	-		-	-	-	489	Inf	Inf	0.0%
6/1	Bury Road Ex	U	N/A	N/A	-		-	-	-	607	Inf	Inf	0.0%
Item	Arriving (pcu)	Leaving (pcu)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Uniform Delay (pcuHr)	Rand + Oversat Delay (pcuHr)	Storage Area Uniform Delay (pcuHr)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Max. Back of Uniform Queue (pcu)	Rand + Oversat Queue (pcu)	Mean Max Queue (pcu)
Network	-	-	318	0	0	11.2	4.9	0.8	16.8	-	-	-	-
Unnamed Junction	-	-	318	0	0	11.2	4.9	0.8	16.8	-	-	-	-
1/1	528	528	-	-	-	2.4	0.4	-	2.8	19.2	10.6	0.4	11.0
2/1	501	501	-	-	-	4.7	2.1	-	6.8	49.0	15.0	2.1	17.2
3/1+3/2	716	716	318	0	0	4.1	2.3	0.8	7.2	36.1	10.7	2.3	13.0
4/1	649	649	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
5/1	489	489	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
6/1	607	607	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
C1			PRC for Signalled Lanes (%): 8.9		PRC Over All Lanes (%): 8.9		Total Delay for Signalled Lanes (pcuHr): 16.81		Total Delay Over All Lanes(pcuHr): 16.81		Cycle Time (s): 120		

Full Input Data And Results

Scenario 5: 'Base 2028 + Allocated Site + dev AM' (FG5: 'Base 2028 + Allocated Site + dev AM', Plan 1: 'Network Control Plan 1')

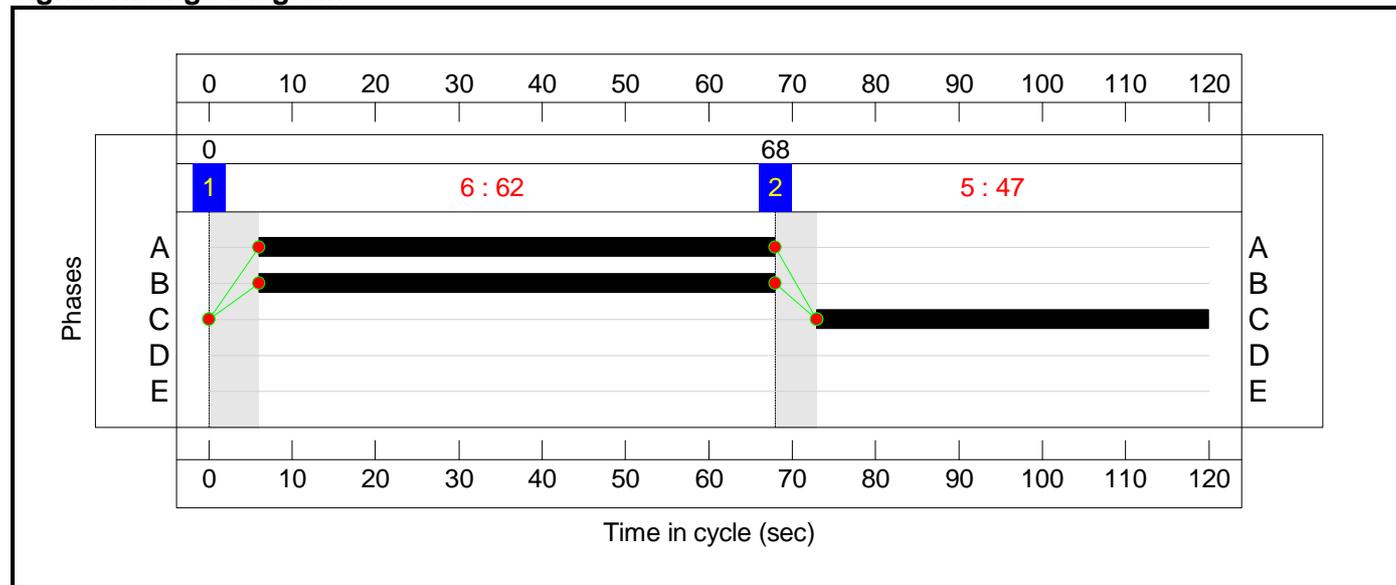
Stage Sequence Diagram



Stage Timings

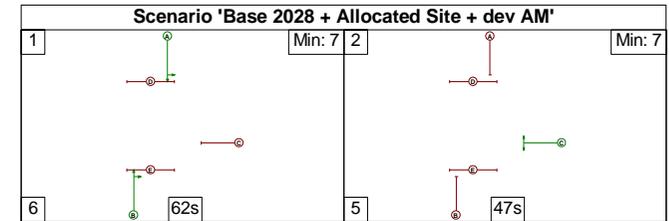
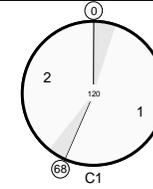
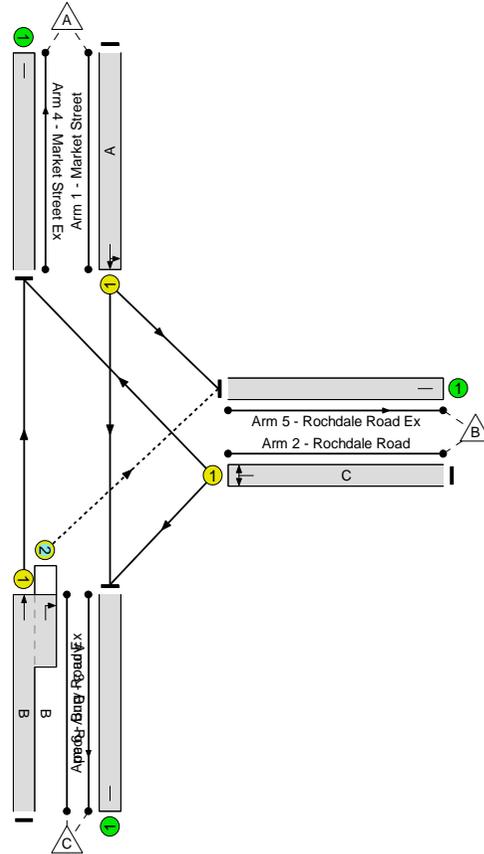
Stage	1	2
Duration	62	47
Change Point	0	68

Signal Timings Diagram



Full Input Data And Results
Network Layout Diagram

Unnamed Junction
 PRC: -5.2 %
 Total Traffic Delay: 26.2 pcuHr



Full Input Data And Results

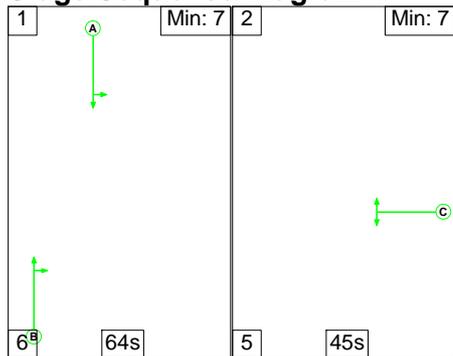
Network Results

Item	Lane Description	Lane Type	Controller Stream	Position In Filtered Route	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)
Network	-	-	N/A	-	-		-	-	-	-	-	-	94.7%
Unnamed Junction	-	-	N/A	-	-		-	-	-	-	-	-	94.7%
1/1	Market Street Left Ahead	U	N/A	N/A	A		1	62	-	605	2076	1090	55.5%
2/1	Rochdale Road Right Left	U	N/A	N/A	C		1	47	-	611	1641	656	93.1%
3/1+3/2	Bury Road Ahead Right	U+O	N/A	N/A	B		1	62	-	578	1915:1808	309+301	94.7 : 94.7%
4/1	Market Street Ex	U	N/A	N/A	-		-	-	-	632	Inf	Inf	0.0%
5/1	Rochdale Road Ex	U	N/A	N/A	-		-	-	-	473	Inf	Inf	0.0%
6/1	Bury Road Ex	U	N/A	N/A	-		-	-	-	689	Inf	Inf	0.0%
Item	Arriving (pcu)	Leaving (pcu)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Uniform Delay (pcuHr)	Rand + Oversat Delay (pcuHr)	Storage Area Uniform Delay (pcuHr)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Max. Back of Uniform Queue (pcu)	Rand + Oversat Queue (pcu)	Mean Max Queue (pcu)
Network	-	-	254	0	31	12.9	12.5	0.9	26.2	-	-	-	-
Unnamed Junction	-	-	254	0	31	12.9	12.5	0.9	26.2	-	-	-	-
1/1	605	605	-	-	-	3.2	0.6	-	3.8	22.8	13.4	0.6	14.1
2/1	611	611	-	-	-	5.8	5.4	-	11.3	66.4	19.3	5.4	24.8
3/1+3/2	578	578	254	0	31	3.8	6.4	0.9	11.1	69.2	9.2	6.4	15.6
4/1	632	632	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
5/1	473	473	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
6/1	689	689	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
C1			PRC for Signalled Lanes (%): -5.2		Total Delay for Signalled Lanes (pcuHr): 26.21		PRC Over All Lanes (%): -5.2		Total Delay Over All Lanes(pcuHr): 26.21		Cycle Time (s): 120		

Full Input Data And Results

Scenario 6: 'Base 2028 + Allocated Site + dev PM' (FG6: 'Base 2028 + Allocated Site + dev PM', Plan 1: 'Network Control Plan 1')

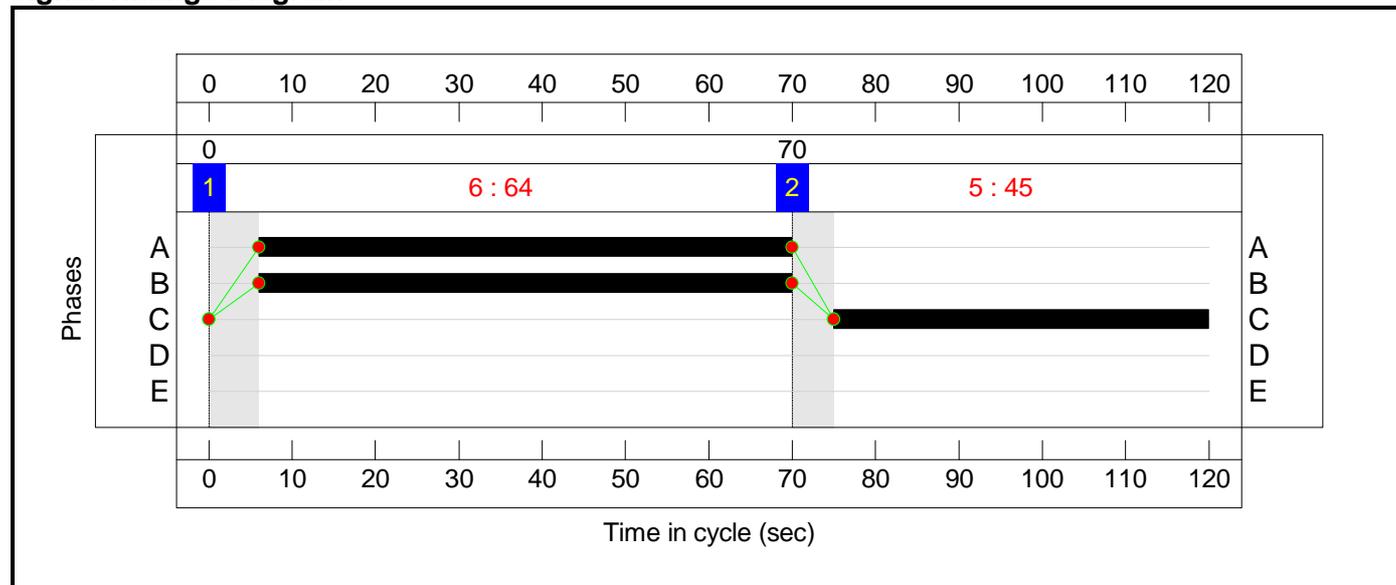
Stage Sequence Diagram



Stage Timings

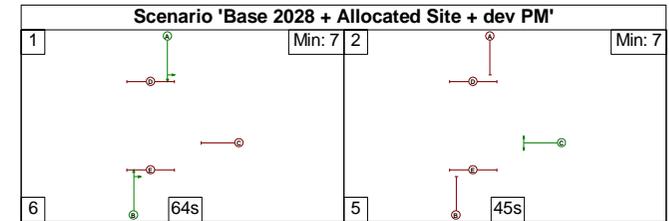
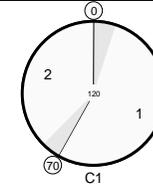
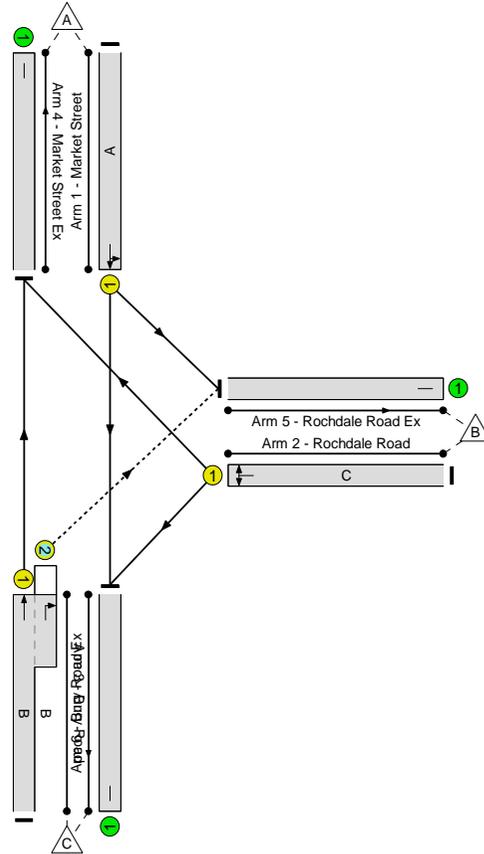
Stage	1	2
Duration	64	45
Change Point	0	70

Signal Timings Diagram



Full Input Data And Results
Network Layout Diagram

Unnamed Junction
 PRC: 6.6 %
 Total Traffic Delay: 18.3 pcuHr



Full Input Data And Results

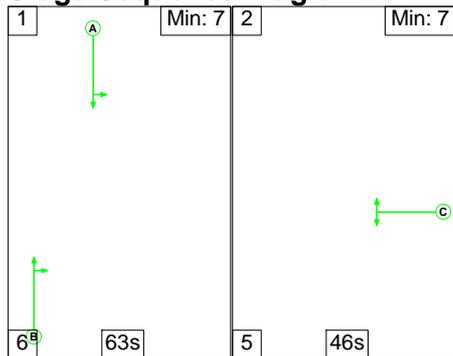
Network Results

Item	Lane Description	Lane Type	Controller Stream	Position In Filtered Route	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)
Network	-	-	N/A	-	-		-	-	-	-	-	-	84.4%
Unnamed Junction	-	-	N/A	-	-		-	-	-	-	-	-	84.4%
1/1	Market Street Left Ahead	U	N/A	N/A	A		1	64	-	537	2075	1124	47.8%
2/1	Rochdale Road Right Left	U	N/A	N/A	C		1	45	-	531	1641	629	84.4%
3/1+3/2	Bury Road Ahead Right	U+O	N/A	N/A	B		1	64	-	748	1915:1808	523+370	83.8 : 83.8%
4/1	Market Street Ex	U	N/A	N/A	-		-	-	-	726	Inf	Inf	0.0%
5/1	Rochdale Road Ex	U	N/A	N/A	-		-	-	-	484	Inf	Inf	0.0%
6/1	Bury Road Ex	U	N/A	N/A	-		-	-	-	606	Inf	Inf	0.0%
Item	Arriving (pcu)	Leaving (pcu)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Uniform Delay (pcuHr)	Rand + Oversat Delay (pcuHr)	Storage Area Uniform Delay (pcuHr)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Max. Back of Uniform Queue (pcu)	Rand + Oversat Queue (pcu)	Mean Max Queue (pcu)
Network	-	-	310	0	0	12.0	5.5	0.8	18.3	-	-	-	-
Unnamed Junction	-	-	310	0	0	12.0	5.5	0.8	18.3	-	-	-	-
1/1	537	537	-	-	-	2.5	0.5	-	3.0	20.1	11.0	0.5	11.5
2/1	531	531	-	-	-	5.0	2.6	-	7.5	51.2	16.1	2.6	18.7
3/1+3/2	748	748	310	0	0	4.5	2.5	0.8	7.7	37.2	15.4	2.5	17.9
4/1	726	726	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
5/1	484	484	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
6/1	606	606	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
C1			PRC for Signalled Lanes (%): 6.6		6.6		Total Delay for Signalled Lanes (pcuHr): 18.27		18.27		Cycle Time (s): 120		
			PRC Over All Lanes (%): 6.6		6.6		Total Delay Over All Lanes(pcuHr): 18.27		18.27				

Full Input Data And Results

Scenario 7: 'Base 2033 + Allocated Site + dev AM' (FG7: 'Base 2033 + Allocated Site + dev AM', Plan 1: 'Network Control Plan 1')

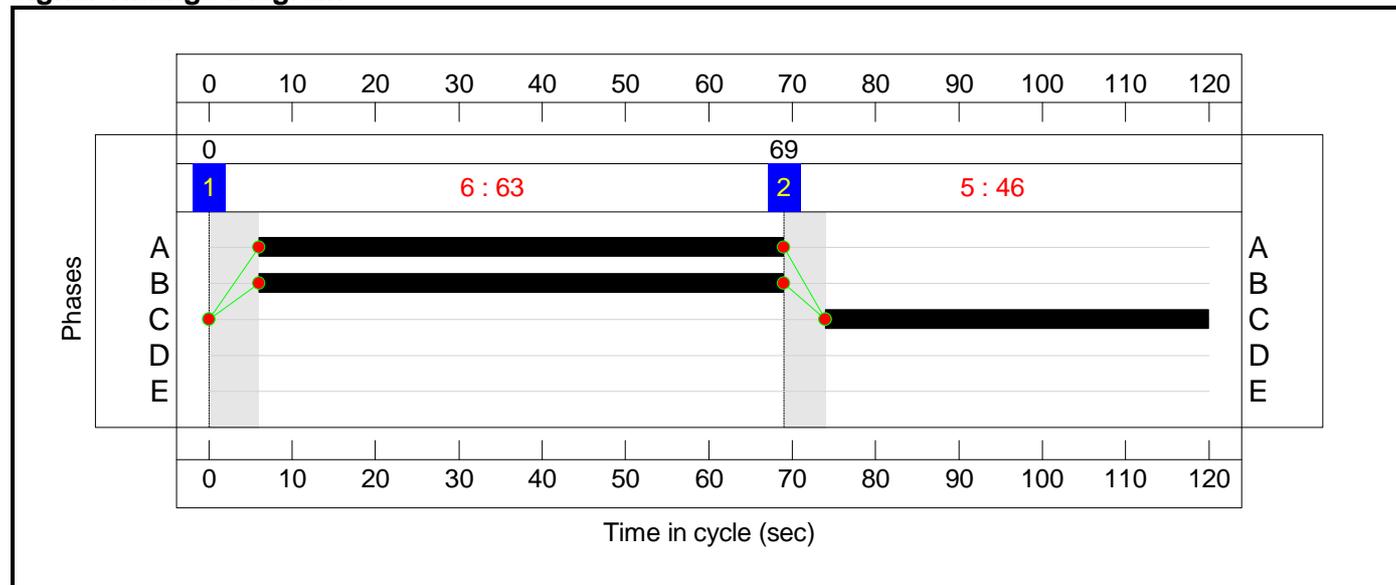
Stage Sequence Diagram



Stage Timings

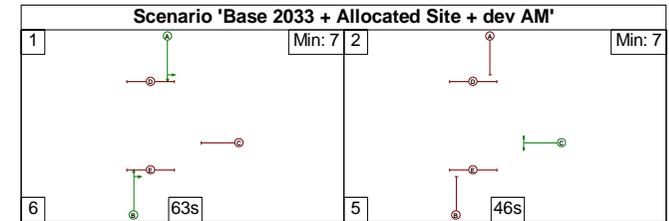
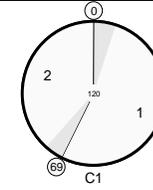
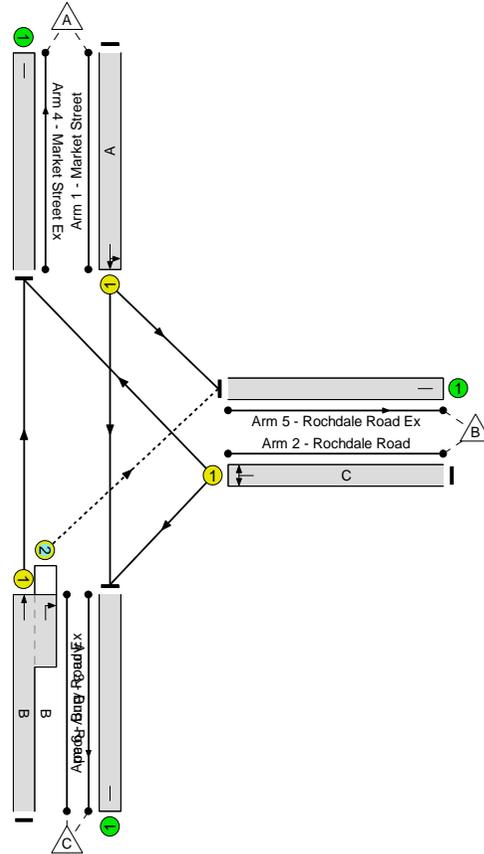
Stage	1	2
Duration	63	46
Change Point	0	69

Signal Timings Diagram



Full Input Data And Results
Network Layout Diagram

Unnamed Junction
 PRC: -8.4 %
 Total Traffic Delay: 31.9 pcuHr



Full Input Data And Results

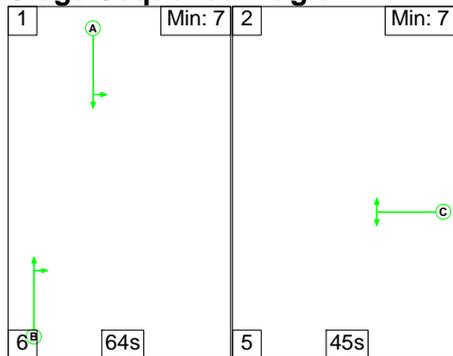
Network Results

Item	Lane Description	Lane Type	Controller Stream	Position In Filtered Route	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)
Network	-	-	N/A	-	-		-	-	-	-	-	-	97.6%
Unnamed Junction	-	-	N/A	-	-		-	-	-	-	-	-	97.6%
1/1	Market Street Left Ahead	U	N/A	N/A	A		1	63	-	617	2076	1107	55.7%
2/1	Rochdale Road Right Left	U	N/A	N/A	C		1	46	-	627	1641	643	97.6%
3/1+3/2	Bury Road Ahead Right	U+O	N/A	N/A	B		1	63	-	589	1915:1808	308+303	96.5 : 96.5%
4/1	Market Street Ex	U	N/A	N/A	-		-	-	-	644	Inf	Inf	0.0%
5/1	Rochdale Road Ex	U	N/A	N/A	-		-	-	-	485	Inf	Inf	0.0%
6/1	Bury Road Ex	U	N/A	N/A	-		-	-	-	704	Inf	Inf	0.0%
Item	Arriving (pcu)	Leaving (pcu)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Uniform Delay (pcuHr)	Rand + Oversat Delay (pcuHr)	Storage Area Uniform Delay (pcuHr)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Max. Back of Uniform Queue (pcu)	Rand + Oversat Queue (pcu)	Mean Max Queue (pcu)
Network	-	-	255	0	37	13.3	17.7	0.9	31.9	-	-	-	-
Unnamed Junction	-	-	255	0	37	13.3	17.7	0.9	31.9	-	-	-	-
1/1	617	617	-	-	-	3.2	0.6	-	3.8	22.3	13.5	0.6	14.2
2/1	627	627	-	-	-	6.3	9.2	-	15.5	88.7	20.6	9.2	29.7
3/1+3/2	589	589	255	0	37	3.9	7.9	0.9	12.7	77.3	9.5	7.9	17.4
4/1	644	644	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
5/1	485	485	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
6/1	704	704	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
C1			PRC for Signalled Lanes (%): -8.4		PRC Over All Lanes (%): -8.4		Total Delay for Signalled Lanes (pcuHr): 31.92		Total Delay Over All Lanes (pcuHr): 31.92		Cycle Time (s): 120		

Full Input Data And Results

Scenario 8: 'Base 2033 + Allocated Site + dev PM' (FG8: 'Base 2033 + Allocated Site + dev PM', Plan 1: 'Network Control Plan 1')

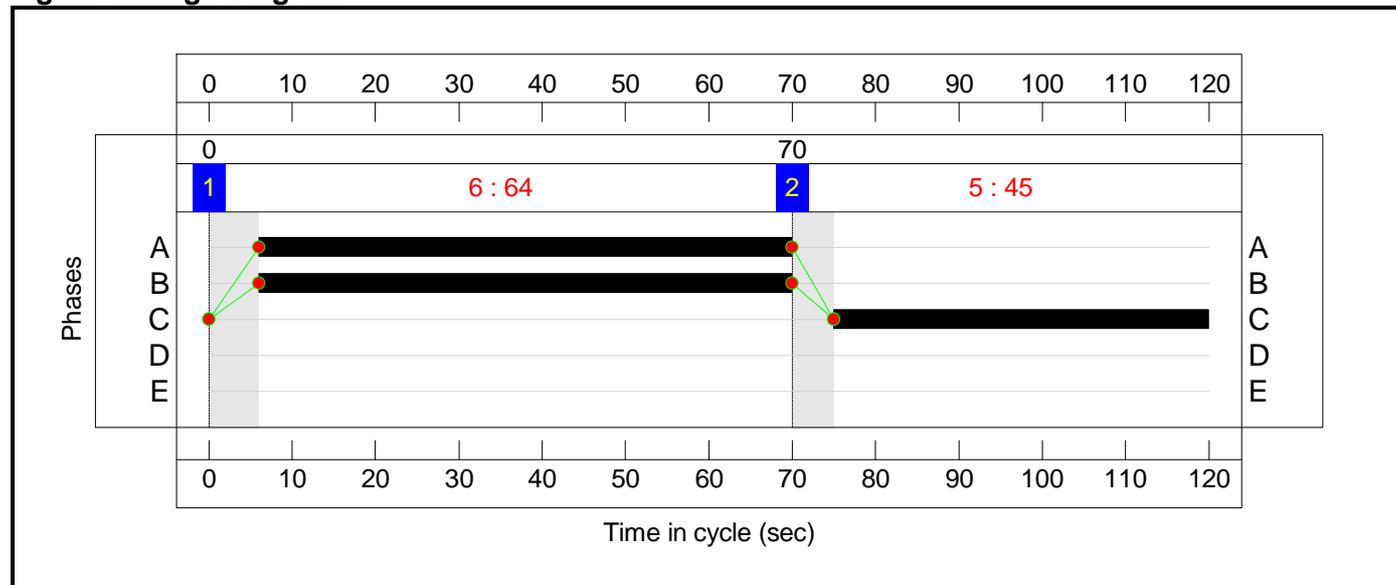
Stage Sequence Diagram



Stage Timings

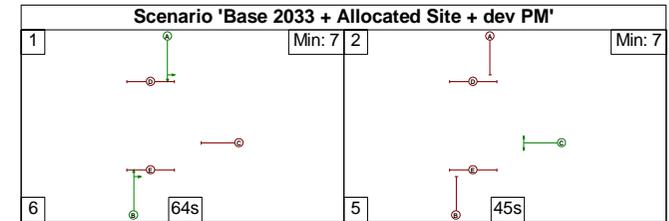
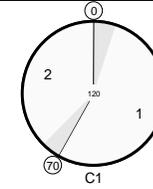
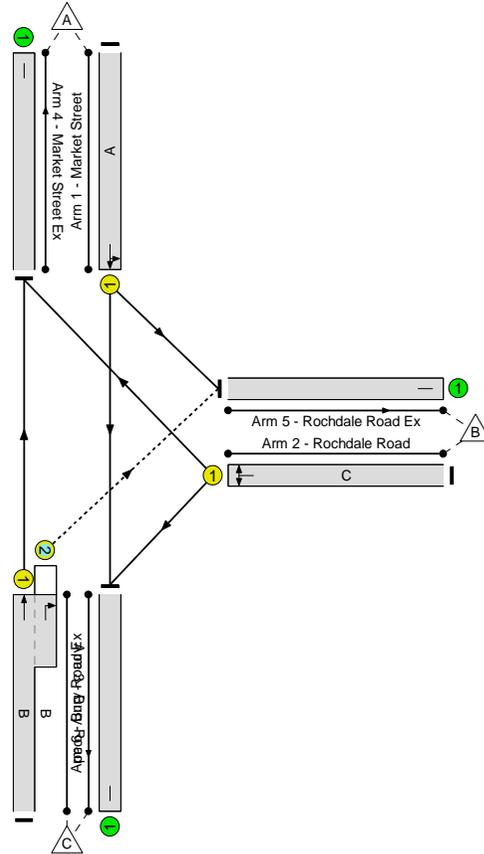
Stage	1	2
Duration	64	45
Change Point	0	70

Signal Timings Diagram



Full Input Data And Results
Network Layout Diagram

Unnamed Junction
 PRC: 2.6 %
 Total Traffic Delay: 20.2 pcuHr



Full Input Data And Results

Network Results

Item	Lane Description	Lane Type	Controller Stream	Position In Filtered Route	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)
Network	-	-	N/A	-	-		-	-	-	-	-	-	87.8%
Unnamed Junction	-	-	N/A	-	-		-	-	-	-	-	-	87.8%
1/1	Market Street Left Ahead	U	N/A	N/A	A		1	64	-	546	2075	1124	48.6%
2/1	Rochdale Road Right Left	U	N/A	N/A	C		1	45	-	545	1641	629	86.6%
3/1+3/2	Bury Road Ahead Right	U+O	N/A	N/A	B		1	64	-	764	1915:1808	508+362	87.8 : 87.8%
4/1	Market Street Ex	U	N/A	N/A	-		-	-	-	741	Inf	Inf	0.0%
5/1	Rochdale Road Ex	U	N/A	N/A	-		-	-	-	495	Inf	Inf	0.0%
6/1	Bury Road Ex	U	N/A	N/A	-		-	-	-	619	Inf	Inf	0.0%
Item	Arriving (pcu)	Leaving (pcu)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Uniform Delay (pcuHr)	Rand + Oversat Delay (pcuHr)	Storage Area Uniform Delay (pcuHr)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Max. Back of Uniform Queue (pcu)	Rand + Oversat Queue (pcu)	Mean Max Queue (pcu)
Network	-	-	316	0	2	12.5	6.9	0.8	20.2	-	-	-	-
Unnamed Junction	-	-	316	0	2	12.5	6.9	0.8	20.2	-	-	-	-
1/1	546	546	-	-	-	2.6	0.5	-	3.1	20.2	11.2	0.5	11.7
2/1	545	545	-	-	-	5.2	3.0	-	8.2	54.1	16.7	3.0	19.7
3/1+3/2	764	764	316	0	2	4.7	3.4	0.8	8.9	42.0	16.4	3.4	19.8
4/1	741	741	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
5/1	495	495	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
6/1	619	619	-	-	-	0.0	0.0	-	0.0	0.0	0.0	0.0	0.0
C1			PRC for Signalled Lanes (%):		2.6	Total Delay for Signalled Lanes (pcuHr):		20.18	Cycle Time (s):		120		
			PRC Over All Lanes (%):		2.6	Total Delay Over All Lanes (pcuHr):		20.18					

**Responses received after 5pm on Friday the 15th of
October 2021**

Rossendale Local Plan : Main Modifications response 15.10.2021

Introduction

McDermott Homes are a SME private housebuilder operating across the North West Region, currently delivering in excess of 300 homes per annum. We are local to the East Lancashire Region operating from our head office base from the neighbouring authority of Hyndburn.

Of note is our success generally across East Lancashire since our inception in 1992, building close to 1,500 dwellings within the East Lancashire Region in this time. Although of late, the Company haven't undertaken much investment in Rossendale apart from the delivered scheme of 36 executive homes at Oaklands in Rawtenstall (previously H9) ; within the last 20 years, we have built out over 600 dwellings in the Rossendale district, developing out housing sites at Haslingden, Rawtenstall, Loveclough, Whitewell Bottom & Bacup

Our commitment to Rossendale is unsurpassed and we strive to assist the Local Authority in achieving their housing delivery targets.

McDermott Homes also have an interest in proposed residential allocation H25 (previously H29). Recently there have been two planning application submitted on the site. Application ref:2019/0214 was refused unanimously by Members in December 2019 despite an Officer's recommendation for approval and a second planning application on the site (Ref:2020/0531) was submitted to address the reasons for refusal, but was recommended for refusal at Planning Committee on 7th September 2021, with the main issue being provision of Affordable Housing.

Detailed Points

Given McDermott Homes historical interest in Rossendale and the very recent experience as to how Rossendale are considering planning applications on proposed residential allocations, it is for this reason that the Company raises the following representations in respect of the following document:

- Schedule of Proposed Main Modifications to the Local Plan (EL12.002)

MM06: HS1

This policy is to be amended to extend the Plan period to 2036 and to increase the overall housing requirement to 3,191 dwellings. However, this is a reduction in the annual housing requirement from 212 dwellings per annum (dpa) to 208dpa for the period 2019/20 to 2020/21 and 185dpa for the period 2021/22 to 2035/36.

The Council is not pursuing a higher figure based on "economic uplift" as was advocated previously in the Plan. This is not positively prepared as the Council's own 2016 SHMA recommends that the need for additional housing in Rossendale is between 265 and 335 dwellings per year.

McDermott Homes considers that the proposed housing requirement of 208dpa followed by 185dpa is not considered to be sound. This is not considered to be consistent with national

policy which looks to support the Government's objective of significantly boosting the supply of homes. McDermott Homes is also concerned that this figure will not address the local affordable housing need, especially as many sites in the east of the Borough (Bacup) are marginal at best in viability terms and will not create an appropriate balance between economic development and housing.

MM07

McDermott Homes note that Rossendale are heading into a new Local Plan with a significant shortfall of homes in the first two years of the Plan. It is confirmed that delivery has totalled 171 dwellings between 2019 and 2021, which is a shortfall of 245 dwellings – this is a delivery of only 41% of its requirement.

Given this as an initial backdrop and the recent experience with our own planning applications on a proposed allocated site, the Company, falling short of undertaking a thorough interrogation of the housing numbers and challenging the 8.2 years supply of housing for the period 2021-2026, has reviewed the proposed early plan period years of delivery disclosed at Table 7 of the Housing Update to 31 March 2021.

If compared to actual housing performance against Core Strategy Housing trajectory over a much longer period (2011 to 2020), the latest draft delivery figures are somewhat over optimistic, the stark reality does not recognise the continual failings on housing performance of the last four years to a “tidal wave” of an influx from 2022 to 2026. It is this past performance which seeks to set the tone of this representation and as an experienced housebuilder, the figures quoted are irrational.

Furthermore, the Inspector should check these numbers presented at Table 7 in the Housing Update document to the Table 7 in the MM008 HS2 Housing Allocations as they are factually, incorrect. As an example, the McDermott Homes site is identified as a deliverable site in years 1-5 of the plan, with a trajectory of 11 dwellings in years 2022/23 and then 20 dwellings per year between 2023 and 2026. This will not happen.

The Company can cite an additional two current examples where further scrutiny is required; also bearing in mind that the planned future sites of volume numbers are not even at the planning application stage yet and the estimates on the delivery of these numbers should be assessed with caution as well

Site allocation reference H57 (previously H65) includes 85 dwellings to the PP supply. This site has been unsuccessfully marketed for the last 18 months with no developer interest. There are third party issues and other major constraints preventing this site from coming forward and informed it is currently in the hands of the LPA receivers. It is our opinion, it will be difficult to secure funding for the development, given the terms of the restrictive s106 Agreement and therefore question the site's validity as a deliverable site.

Site allocation reference H64 (previously H74) includes 131 dwellings over the next 5 years and 8 dwellings to the PP supply. This application on an allocated site has been lodged with the Authority for 18 months, with little progress on a planning decision and experiencing the same impasse with the Authority as H25, previously H29.

Our experiences are such that the matter of allocating sites is overlooked; the real test is at application stage. No consents equals no delivery and this is clearly demonstrated in respect of H25, previously H29.

There is a heavy reliance of the estimated delivery of the numbers from the less affluent east area of the Borough in the first 5 years where sales rates are notably slower.

The test of delivery will be further hampered by the fact at the planning stage because there is no alignment between the evidence contained within approved document EB019 Rossendale Local Plan Economic Viability Assessment (March 2019) produced by Keppie Massie and the Local Authority's choice of Viability Assessment consultants whom they select to assess viability.

The Company has taken the liberty of appending the recent Report to Committee of the planning application ref: 2020/0531. Our reason for withdrawing the application was the declared position where the Local Authority consider they are at. It is unjustified and unsound to declare a false position of 8.2 years land supply by the Local Authority.

A further review and wider test to expose the housing shortfall will produce evidence to demonstrate that the Local Authority cannot demonstrate a 5 year supply.

For the reasons above, further assessment of the allocated sites is required, the latest document is factually incorrect, wholly inadequate and does not demonstrate that it is sound and justified.

Appended:

Rossendale BC Officer Report to Committee Item No B.3 dated 7th September 2021

Application Number:	2020/0531	Application Type:	Major
Proposal:	Full: Erection of 71 no. dwellings (comprising 39no. 3 beds and 32no. 4 beds) with associated works including car parking, landscaping, open space and pumping station	Location:	Land Off Fieldfare Way, Bacup
Report of:	Planning Manager	Status:	For Publication
Report to:	Development Control Committee	Date:	7 September 2021
Applicant(s):	McDermott Homes	Determination Expiry Date:	10 September 2021
Agent:	N/A		

Contact Officer:	Lauren Ashworth	Telephone:	01706 238637
Email:	planning@rossendalebc.gov.uk		

REASON FOR REPORTING	
Outside Officer Scheme of Delegation	✓ (Major Application)
Member Call-In Name of Member: Reason for Call-In:	
3 or more objections received	✓
Other (please state):	Council land

HUMAN RIGHTS

The relevant provisions of the Human Rights Act 1998 and the European Convention on Human Rights have been taken into account in the preparation of this report, particularly the implications arising from the following rights:-

Article 8

The right to respect for private and family life, home and correspondence.

Article 1 of Protocol 1

The right of peaceful enjoyment of possessions and protection of property.

1. RECOMMENDATION

Refuse for the reason set out Section 10 of this report.

2. SITE

The site comprises an irregularly shaped parcel of Greenfield land extending to approximately 3.17 hectares located within the urban boundary of Bacup. It is sandwiched between Pennine Road to the west and Goldcrest Avenue to the east. To the north is St Mary's RC Primary School and to the south is Fieldfare Way.

The site is currently designated as Greenlands on the Proposals Map, and is characterised by an open area of grassland within an otherwise suburban environment. No public rights of way cross the site, though it does have some informal paths leading over it in addition to remnants of a BMX track located in the centre including a dirt track, artificial mounds and part of a concrete slab. There is a direct pedestrian link from Pennine Road to the west into the site and from Fieldfare Way to the south east.

The site contains a small number of trees and shrubs however there is a more notable belt of trees immediately to the east (to the rear of properties on Goldcrest Avenue). The trees were planted around 7 years ago by the applicant McDermott Homes as part of planning permission 2004/401.

There is an area of maintained amenity grassland at the south-eastern part of the site where it meets Fieldfare Way and Goldcrest Avenue. The maintained amenity grassland and the belt of trees to the east of the site are protected areas of public open space / incidental open space provided by McDermott Homes as part of permission 2004/401 and secured in a Section 106 Agreement.

Regular walking, dog walking and other recreational activities are present across the site as a whole but appear most pronounced at the southern end. The land slopes from east to west.

The site is approximately 750 meters from Bacup Town Centre. The land is within three ownerships, with the majority owned by Rossendale Borough Council, the proposed site access is owned by the applicant and the northern section is owned by a third party.

The site is allocated for housing in the emerging Local Plan.

3. RELEVANT PLANNING HISTORY

2019/0214 - Full: Erection of 71 no. dwellings (comprising 39no. 3 beds and 32no. 4 beds) with associated works including car parking, landscaping, open space and pumping station. Refused for the following reason:

"The proposed development for 71 dwellings on a greenfield site would give rise to the following adverse impacts:

- *Failure to provide a policy-compliant level of affordable housing*
- *Harm by way of the loss of open space / Greenlands*
- *Harm to the character of the area by reason of the urbanisation of the site*
- *Harmful impact from biodiversity loss*

As a matter of planning judgement, when applying the tilted balance as required by the National Planning Policy Framework (paragraph 11d), the above cumulative adverse impacts of the development would significantly and demonstrably outweigh its cumulative benefits and therefore the proposal conflicts with the presumption in favour of sustainable

development within the Framework, and conflicts with the development plan (Rossendale Core Strategy DPD Policies 1, 2, 4, 17, 18 and 24.”

4. PROPOSAL

Full planning permission is sought for the erection of 71 detached dwellings (39 x 3 beds and 32 x 4 beds) with associated works including access from Fieldfare Way.

To support the application, the applicant has submitted the following documents:

- Open Space Assessment
- Financial Viability Appraisal
- Geo-Environmental Report
- Design and Access Statement
- Ecological Assessment and Ecological Enhancement Letter
- Badger Survey and Method Statement
- Arboricultural Constraints Report
- Flood Risk Assessment and Drainage Strategy
- Planning Statement
- Transport Statement
- Statement of Community Involvement
- Construction Management Plan (including for biodiversity)

5. POLICY CONTEXT

National

National Planning Policy Framework (2021)

- Section 2 Achieving sustainable development
- Section 4 Decision making
- Section 5 Delivering a sufficient supply of homes
- Section 8 Promoting healthy and safe communities
- Section 9 Promoting sustainable transport
- Section 11 Making effective use of land
- Section 12 Achieving well-designed places
- Section 14 Meeting the challenges of climate change, flooding and coastal change
- Section 15 Conserving and enhancing the natural environment

Development Plan Policies

Rossendale Core Strategy DPD (2011)

- AVP 2 Strategy for Bacup
- Policy 1 General Development Locations and Principles
- Policy 4 Affordable Housing
- Policy 8 Transport
- Policy 9 Accessibility
- Policy 16 Preserving and Enhancing Rossendale's Built Environment
- Policy 17 Rossendale's Green Infrastructure
- Policy 18 Biodiversity and Landscape Conservation
- Policy 19 Climate Change and Low and Zero Carbon sources of Energy
- Policy 21 Supporting the Rural Economy and its Communities
- Policy 22 Planning Contributions
- Policy 23 Promoting High Quality Design & Spaces

Other Material Planning Considerations

National Design Guide
 National Planning Practice Guidance
 RBC Alterations and Extensions to Residential Properties SPD
 LCC Planning Obligations in Lancashire (2008)
 RBC Open Space & Play Equipment Contributions SPD

Emerging Local Plan Policies:

Strategic Policy SS: Spatial Strategy
 Strategic Policy SD1: Presumption in Favour of Sustainable Development
 Strategic Policy SD2: Urban Boundary and Green Belt
 Policy SD3: Planning Obligations
 Strategic Policy HS1: Meeting Rossendale’s Housing Requirement
 Policy HS2: Housing Site Allocations
 Policy HS6: Affordable Housing
 Policy HS7: Housing Density
 Policy HS8: Housing Standards
 Policy HS10: Open Space Requirements in New Housing Developments
 Policy HS11: Playing Pitch Requirements in New Housing Developments
 Policy HS12: Private Outdoor amenity space
 Strategic Policy ENV1: High Quality Development in the Borough
 Policy ENV4: Biodiversity, Geodiversity and Ecological Networks
 Policy ENV6: Environmental Protection
 Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality
 Policy ENV10: Trees and Hedgerows
 Policy TR4: Parking

The Post Hearing Letter requires site-specific policies for some of the proposed allocations including the application site, to provide detail on site requirements and mitigation measures where necessary. For this site, it is likely to relate to access, open space, landscaping and ecology. The policy will be consulted upon shortly for 6 weeks as a Main Modification to the emerging Local Plan.

6. CONSULTATION RESPONSES

Consultee	Response	Conditions recommended?
LCC Lead Local Flood Authority	No objection	Yes
LCC Highways	No objection	Yes
Contaminated Land Officer	No objection	Yes
LCC Public Rights of Way	Incorporated into LCC Highways response	Financial contribution required
United Utilities	No objection	Yes
LCC Planning Contributions (education)	No objection (no contribution necessary)	No

Greater Manchester Ecology Unit	No objection	Yes
Lancashire Badger Group	No objection	Yes
RBC Environmental Health	No objection	Yes
Tree Officer	No objection	Yes
East Lancashire NHS Trust	Require financial contribution	No
RBC Strategic Housing	30% affordable housing should be provide on site, with a 50/50 split between social rent and shared ownership	No – to be secured in S106 Agreement

7. NOTIFICATION RESPONSES

To accord with the General Development Procedure Order a press notice was published, site notices were posted and letters were sent to neighbours.

100 objections have been received. The key areas of concern are summarised below:

- The current application has not addressed the previous reason for refusal.
- This development will decimate the only useable green space within a mile of the estate where children can safely play. The only other 2 space where children can play are Britannia play area, where there is a small park with 4/5 little play things there, and also a closed area to play football or basketball. This is just short of a mile away from the estate. This has to be accessed via a walk along a busy main road, or going across back roads and again via a busy road. The next are is Stubby Lee park, again just under a mile away via 2 busy roads.
- The land is an active BMX track and public open space which is a safe play space enjoyed by children within the immediate vicinity. Any proposals to develop this area should include provision on site to mitigate the loss of amenity.
- I think this development would put residents living on field fare way in danger with the increased flow of traffic. My children play quite frequently on this land along with other children from the area there is also a lot of wildlife living in this land that would be affected for example foxes and badgers.
- The said land is the only parcel of green space, which has been left to nature, hence the wildlife. Rossendale Borough Council and the people of Bacup own this land. This land provides recreation space for the people of Bacup. There is a childrens BMX cycle track situated on this land. My kids used and the kids on the road still use it. We use this land for walking, leisure, exercising our pet dogs. The kids use it for camping out in summer, for organising local bonfires on November 5th. We have done this for over 30 years as that is how long I have lived here and our children used to do it.
- Traffic is an existing problem on Fieldfare Road already; it would be better if there were two entrances or exists. The estate is already overcrowded, causing concern for the accessibility for emergency services.
- There is no infrastructure in place to cope with all the extra traffic, The traffic now is a accident waiting to happen

- How are schools and doctors going to cope with full capacity already.
- Where is the provision for extra school places for all the additional children there will be when parents already find it hard to get places for their children.
- We don't need any more houses to be built on the remaining bit of greenery we have.
- What's going to happen to all the wildlife on the land Deers, foxes and badgers, hedgehogs, bats etc.
- On the new estates roads are not wide enough for traffic to pass this causes gridlock.
- Snow leads to cars being abandoned causing roadblocks and accidents.
- The BMX track which is used by local children will be lost, this is the only safe area for them to play.
- It is over saturation of the piece of land.
- At the time we purchased our house we were assured by the McDermott sales person at the time (Caroline) that the local authority land to the rear of our property would not be developed.
- 71 houses crams every available bit of space, this is far too many. Why not build 50 houses and create a playground for the children of the area to use. If you take away all the green space there will be more children playing in the street, more danger from vehicles due to idiot drivers and more traffic.
- Pennine Road access would be flatter exit/entry – why is this not being factored in
- A playground was promised would be built on the land at the end of Goldcrest/junction of Fieldfare – 11 years on since we moved in, nothing built. This bit of the land is now this is to become a road junction!
- This is another example of our wonderful countryside being taken away.
- Flooding - the land proposed for this development is very boggy after rain. With the area already having flooding issues such as on Boxing Day 2016 building this development and the loss of the green space is only going to lead to more flooding issues. Potential also affecting other towns further down the valley.
- The applicant has indicated that the payment of any S106 contributions would make the scheme not viable. I note that the applicant argues this on the basis of profitability.
- Concerns over the drainage of the land, creating them homes there will mean the water will run off on to surrounding properties.
- The amount of inconvenience building will cause. It will block access to Fieldfare Way for months meaning our lives would be at risk of losing our jobs for being late.
- The amount of dirt that will go on the roads and will not be cleaned.
- The extra pollution caused by so many cars being on the road, making the breathing air not as fresh for residents.
- The extra stress on water and gas and electricity network.
- The extra noise created by having so many new homes.

8. ASSESSMENT

The main considerations of the application are:

Principle

Loss of open space and Greenlands

The site is within the defined urban boundary of Bacup, where Policy 1 of the Core Strategy seeks to locate the majority of new development. The majority of the land is surrounded by existing residential development. However, the site is currently designated as Greenlands – spaces protected by Policy 17 of the Core Strategy for their value in maintaining areas of

open space within otherwise built-up areas, for the benefit of residents, biodiversity and the Borough's Green Infrastructure Network. Ordinarily any application for residential development on a Greenlands designation would need to demonstrate that it would not lead to unacceptable harm to the Borough's wider Greenlands network, and that the current function of the site in question as a Greenlands (in terms of its recreational value, visual amenity value, biodiversity value and function as part of the Borough's Green Infrastructure network) is not sufficiently valuable as to warrant its retention as open space.

The National Planning Policy Framework is a material consideration in the determination of this application. Section 8 of the Framework relates to 'Promoting healthy and safe communities' and more specifically, open space and recreation. Paragraph 99 states:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."*

Open space is defined in the Framework as "All open space of public value including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity." The site falls within this definition, and, more specifically, is 'amenity greenspace' which provides opportunities for informal recreation close to homes or work or enhances the appearance of residential or other areas. As the site is open space for the purposes of The Framework, an assessment against paragraph 99 is triggered and submitted a statement with the application to demonstrate how they consider the scheme complies with paragraph 99.

An Open Space Assessment was prepared by Pegasus Group on behalf of the applicant within which it considers the availability of amenity greenspace within Irwell ward (the assessment area was agreed with Forward Planning Officers). The assessment refers to the 2015 Fields in Trust *Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard* which sets out benchmark guidelines in terms of the quantity, quality and accessibility of open spaces at *Table 3 Fields in Trust Recommended Benchmark Guidelines – Informal Outdoor Space*. The guidance identifies a minimum requirement of 0.6ha of 'amenity greenspace' per 1,000 population. The assessment finds that Irwell ward has a population of 5,505 (Census 2011), thus has a total minimum requirement of 3.30ha of 'amenity greenspace'. In terms of quantity, the assessment finds that collectively the 'amenity greenspaces' have a combined area of 9.48ha and of this 9.48ha, 5.95ha has been found to be high quality. The report concludes that there is a large surplus within the assessment area and therefore it is demonstrated that the proposed development complies with paragraph 99, part a) of the Framework.

Notwithstanding the above, the Council commissioned Knight Kavanagh & Page Ltd to deliver an Open Space Assessment as a key part of the evidence base for the emerging Local Plan. The application site is referenced as Site ID 479, and categorised as 2.64 hectares of "urban greenspace".

The site is within the Bacup and Stacksteads Analysis Area which currently is sufficient against the quantity standard for urban greenspace. The site rates below the quality

threshold. It is within the catchment of other existing urban greenspaces (Ref 478, 491, 266, 268, 123). However, Ref 491 (H37) and 266/128 (H41) are also identified as allocated sites for housing.

The Assessment finds that the potential combined loss of Ref 479 and Ref 491 would create a quantity shortfall but would not create an accessibility gap in urban greenspace provision. On this basis, the Assessment concludes that the site does not need to be retained as urban greenspace, if quality improvements to the other sites in the area were to be undertaken.

As will be considered later in this report, the application proposes a financial contribution towards the enhancement of facilities at the nearby Hawthorn Road play area. In addition, the proposed development incorporates considerable tree planting and on-site communal landscaping that can be utilised by local residents.

Principle of residential development

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF (paragraph 48) advises that LPAs may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

At the heart of the Framework is a presumption in favour of sustainable development, which means securing net gains across economic, social and environmental objectives.

Starting with the adopted development plan, the site is located in the urban boundary, where new development is directed to via Policy 1 of the Core Strategy. Policy 2 states that previously developed land should be prioritised (the site is greenfield) however unallocated greenfield sites will be permitted where certain criteria apply. This includes the delivery of "...significant social, economic or environmental benefits." Policy 3 directs significant numbers of new housing to Bacup.

Turning to the emerging Local Plan, through Policy HS2, the site is proposed as a housing allocation (ref H29) to be delivered in years 1-5. The Local Plan has been through Examination in Public and the Inspector has issued a post-hearing letter. The Council will consult on the Main Modifications shortly. The Plan is at an advanced stage and when the Main Modifications are published, greater weight can be attached to the policies.

In response to the Inspectors' query which prompted the Housing Update (May 2021) and which reported to the period up to 31 March 2020, the Council can demonstrate a supply of housing which exceeds a 5 year supply (at 8.2 years). This is based on sites with appropriate consents as well as proposed housing allocations. Now that the Post Hearing Letter has been issued by the Local Plan Inspectors (30 June 2021) the Council is looking to update this, taking account of the Post Hearing Letter as well as an update to 31 March 2021.

However, for the avoidance of doubt, officers have given appropriate regard to Paragraph 11 of the Framework which states:

“c) Approve development proposals that accord with an up to date development plan without delay; or

d) Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

Until the 5-year supply position is published, paragraph (d) above is triggered. The Framework clarifies that policies that are most important to an application are considered out of date where local authorities cannot demonstrate a five year supply of deliverable housing sites. In this case the policies controlling the supply of housing includes Policy 17 ‘Greenlands’ as it impacts upon the principle of the development.

Paragraph 11(d)(ii) is therefore engaged i.e. planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

Conclusion on principle

Having regard to all of the above factors, and policies within both the adopted development plan and the emerging plan, the site is considered to be suitable for residential development in principle.

Sustainable Development

Paragraph 11 of the Framework contains a presumption in favour of sustainable development, and as such a key consideration in this case is whether the proposed scheme represents sustainable development or not. The Framework promotes the integration of development with sustainable modes of transport, and paragraph 110 states that developments should *“give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas”*.

Policy 1 of the Core Strategy requires that developments:

“Maximise access by public transport, walking and cycling in a manner that promotes safe and inclusive communities and promote co-location of services and facilities.”

Policy 9 of the Core Strategy states that the transport user hierarchy will form the basis of consideration of planning applications, in order to promote sustainable travel and better designed places. The hierarchy is as follows, and consideration is given to the impact of the proposal on users higher up the hierarchy first:

- *Pedestrians and mobility impaired users*

- *Cyclists and equestrians*
- *Emergency Vehicles and refuse collection*
- *Public Transport, motorcycles and taxis*
- *Freight movement*
- *Private cars*

Emerging Policy SD1 reiterates the presumption in favour of sustainable development from the NPPF.

The route to Bacup Town Centre from the site (whilst further than would be ideal for encouraging pedestrian journeys) is generally served by continuous footways and is along well-lit streets, and a regular bus service runs along Rochdale Road (located around 280m from the site). The site is within a short walk to the nearest primary school and nearby playgrounds and leisure activities within the open countryside, to enable occupants to participate in a healthy lifestyle.

In addition, the site's sustainability was assessed as part of an appraisal to inform the proposed allocation.

For all of the reasons above, it is considered that the site is sustainably located.

Other considerations

Layout and design

As this is a full planning application, all matters are for approval and as such the application is accompanied by detailed drawings to show the design of each dwelling and the layout of the scheme as a whole. Full boundary treatment details are included, in addition to a full materials palette.

The layout of the development and the design of the dwellings largely reflect the neighbouring development to the east (Goldcrest Avenue, Sisken Avenue etc) which was by the same housebuilder McDermott Homes.

A mix of 3 and 4 bedroom dwellings are proposed comprising 32 x 3 bedrooms and 39 x 4 bedrooms. The submitted layout plan shows that access is proposed from Fieldfare Way and the spine road runs through the approximate centre of the site. The dwellings on the west side of the road face onto the road, and the dwellings to the east side typically face north or south and are arranged around cul-de-sacs. All dwellings are detached, all with private amenity space to the rear and small gardens to the front. All dwellings have driveways and some have garages.

Section 2.1 of the Council's Alterations and Extensions to Residential Properties SPD contains guidance on separation distances between habitable room windows. It specifies that there should be a minimum of 20m between habitable room windows in properties that are directly facing each other. The layout of the development demonstrates compliance with this guidance.

The dwellings are proposed to be constructed from artificial buff stone and concrete roof tiles, white upvc window frames, black upvc garage doors and front doors and black upvc guttering. Ordinarily officers would consider the use of artificial stone and concrete roof tiles to be inappropriate and contrary to policy, however, having regard to the similar materials used on the development to the east, and the low quality materials present on Pennine

Road (pebble dash and red coloured concrete roof tiles), it is considered that even without the use of local, natural materials, the proposed development will not harm the character and quality of the area to a degree that warrants refusal on this matter. With this in mind and on balance, the proposed materials palette is considered acceptable in this instance.

All dwellings are two storey and this is appropriate for this site, having regard to the surrounding residential developments and the site's location and topography. Site sections have been included with the submission, however, it is necessary to attach a planning condition that requires full details of existing and proposed ground levels and finished floor levels across the site, including any retaining walls that may be necessary.

The design of the dwellings themselves is considered to be standard. They are an improvement to the design of dwellings on Pennine Road and are similar to the recently constructed houses to the east.

A number of important changes have been made to the scheme to address objections from officers. As originally submitted there was a shortfall of 39 car parking spaces due to all 39 garages having dimensions lower than the minimum standard meaning they cannot count as parking spaces. The applicant has now increased the dimensions of the garages to 3m x 6m to meet the minimum standard, meaning that all garages (except for 5no) can be counted as parking spaces. Of the 5 that have not been amended, 2 of these have enlarged driveways, meaning that the shortfall has fallen to just 3 spaces. This significantly reduces the likelihood, as far as is reasonably possible, of cars being parked on-street and addresses the LPA's previous concerns in this regard.

Other negotiated changes include the provision of a footpath link from the northern end of the site to meet the existing public footpath FP 660 and the applicant has agreed to provide £69,925 to fund the upgrade of this footpath, as required by LCC Highways. In addition, the development includes the provision of informal access points into the wooded areas to the east and west of the site.

Overall the proposed development is now considered to accord with relevant local and national policy with regards to layout and design.

Neighbour Amenity

The proposed development would not have any unacceptable impact on the daylight, privacy or outlook enjoyed by the occupants of any nearby residential properties, having regard to the proposed siting, orientation and levels of the proposed dwellings.

Given the proximity of nearby residential properties and the scale of the proposed development, it is considered appropriate to include a condition restricting the hours of construction on site.

Subject to the above, the scheme is considered acceptable in terms of neighbour amenity.

Access, Parking and Highway Safety

The application has been assessed by Lancashire County Council's Highway Engineer (LCC Highways) who raised no objection on highway safety grounds subject to conditions.

Landscaping

As the site is greenfield (i.e. not previously developed) and is designated as Greenlands in the development plan (being recognised for its recreational value, visual amenity value, biodiversity value and function as part of the Borough's Green Infrastructure network), how the proposed residential development is intended to be landscaped is fundamental to the overall acceptability of the scheme.

The application is accompanied by the following:

- Arboricultural Constraints Report
- Landscape Proposals 1 and 2
- Ecological Survey and Assessment
- Ecological Enhancements Letter
- Construction Management Plan including biodiversity

The Council's Tree Officer has reviewed the applicant's Arboricultural Constraints Report, in conjunction with the landscaping planting proposal drawings. In terms of existing trees, the report finds only two trees on site to be of category B (trees T25 and T29) and the majority of the rest are of category C. The two category B trees are on adjacent land to the west of the site and therefore outside the applicant's ownership and are to be retained. The large belt of trees to the east are to be retained and enhanced (they are shown in the blue edge on the site location plan) although full details of any enhancement will need to be secured by planning condition.

In terms of proposed landscaping, full details of planting have been submitted and in summary this includes approximately 149 trees which are proposed to be planted throughout the site, but particularly along the spine road, in the area of open space to the north, and along the western boundary behind Pennine Road. In addition to tree planting there will be shrubs, native plant mix, specimen plants and hedging plants. The area of open space to the northern end of the site will include tree planting, native shrub planting, benches, and grassed areas.

The Tree Officer concludes that the proposed development provides for a gain in landscape and green space variety and provision, noting that the schedule of plants is satisfactory as is the specification for ground preparation, cultivation, planting and turfing.

Subject to the use of planning conditions, relating to protective fences, compliance with the submitted landscaping plans, and the use of TPOs where appropriate, the development is acceptable with regards to landscaping.

Ecology

The previous application was originally accompanied by an Ecological Assessment which presents the ecological, biodiversity and nature conservation status of the site. The Council's Ecological advisor Greater Manchester Ecology Unit (GMEU) found that the assessment has been undertaken by a licensed and experienced ecological consultancy whose work is known to them. The ecological consultants appear to have undertaken a detailed survey of the site and carried out an appropriate level of survey. The survey found the site to have some limited ecological value. GMEU has been consulted on this resubmission application and their comments remain the same and are set out below.

Both the Lancashire Badger Group and GMEU have reviewed the submitted Badger Survey and Mitigation Strategy and raise no objection to it subject to a condition that requires the developer to adhere to the recommendations in section 4.3 to ensure that badger are suitably protected.

With regards to bats, none of the trees on site were assessed as being suitable for use by roosting bats, although bats may foraging and commute across the site. GMEU agrees with the Ecological Assessment which recommends that the lighting for the site be designed to limit light pollution and disturbance to bats. This would be secured by planning condition.

With regards to nesting birds, GMEU notes the site supports suitable nesting habitat for birds. As all wild birds, their nest and eggs are protected under the Wildlife and Countryside Act 1981 (as amended) they recommend a condition be attached to any permission that limits works to trees and other vegetation to certain times of the year.

A Construction Management Plan and Ecological Enhancement Letter have been submitted in support of the revised application, following comments from the Council's ecological advisor GMEU. GMEU has commented as follows:

"The additional information on biodiversity enhancement measures at the site is acceptable and we would therefore advise that the following condition be attached to any permission:

All ecological measures shall be carried out in accordance with the details contained in the letter from ERAP Ltd dated 13th January 2021 (ref 2020- 284c) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination."

Subject to the conditions described above, no objections are raised by the GMEU or Lancashire Badger Group and the development is found to be acceptable with regards to ecology and biodiversity.

Flood risk and drainage

The site extends to 3.17 hectares and is located within Flood Zone 1. The application is accompanied by a Flood Risk Assessment and Drainage Management Strategy which have been reviewed by the Lead Local Flood Authority and United Utilities. No objections have been raised subject to a condition requiring the final details of a sustainable drainage scheme, SUDS and SUDS management to be submitted for approval.

Subject to conditions, the scheme is considered acceptable in principle with regards to flood risk and drainage.

Land Contamination

The application is accompanied by a Geo-Environmental Assessment Report which has been reviewed by the Council's Contaminated Land Officer. The officer has identified that gas monitoring has been undertaken however additional consideration and discussion needs to be had in relation to this in order to justify the downgrading of gas protection (from Amber 1 to Green) that is suggested. Secondly, traces of asbestos have been detected in two of the four samples tested. Levels were low and the report advises that the overall risk is low. However, the officer requires further discussion and soil sampling across the site as four samples are in adequate. An updated Geo-Environmental Assessment Report

(October 2019) was submitted in November 2019 which identifies that additional work has been undertaken with regards to the gas monitoring data and asbestos.

Notwithstanding the above, the officer considers the site to be otherwise a relatively low risk but that remedial measures are likely to be required in some form or another and may need to be site wide. As such, the Contaminated Land Officer is satisfied that the proposed residential development is acceptable subject to a planning condition requiring a full site investigation report and details of remedial works to be submitted for approval in advance of any development commencing.

Planning Contributions and Viability

Policy 22 of the Core Strategy relates to planning obligations and states that where developments will create additional need for improvements / provision of services or facilities, contributions will be sought to ensure that the appropriate improvements are made.

Policy 4 requires a minimum of 30% affordable housing to be provided on-site on Greenfield sites over 10 dwellings and affordable provision should comprise an equal mix of affordable housing tenures.

Policy HS6 of the emerging Local Plan similarly requires all new housing developments of 10 or more dwellings to provide “30% on-site affordable housing, subject to site and development considerations.” The affordable housing shall be provided “...in line with identified needs of tenure, size and type as set out in the latest available information on housing needs.”

With reference to the above policies, the development has necessitated the following contributions:

- £69,925 contribution to fund public footpath upgrades; and
- £96,986 towards open space and play provision.

The Council's Strategic Housing Officer provided the following response:

“To be compliant with the current Core Strategy, and meet housing need, 21 affordable homes (30%) should be delivered onsite subsidised by planning obligations, and the following units are required:

*7 x 2 bedroom 4 person Social Rented houses
4 x 3 bedroom 6 person Social Rented houses
3 x 2 bedroom 4 person Shared Ownership houses
7 x 3 bedroom 6 person Shared Ownership house”*

Members will recall that the previous application (ref 2019/0214) offered 9 (13%) affordable houses of shared ownership tenure, and all were to be grant-funded (i.e. funded by the public purse and not the developer). Members refused the application, considering that the development should be providing a policy-complaint level of affordable housing (30%) unless a viability case justifies a reduced level.

In November 2020, the revised application was submitted with a viability case made by the Applicant stating that the site could not afford to deliver affordable housing or other

contributions. However, notwithstanding their own viability concerns, the Applicant was willing to provide 10 shared ownership affordable dwellings (14%) and the POS contribution of £96,986. The affordable houses were to be delivered through the S106 and therefore were not grant-funded. At this stage, the Applicant was not willing to provide the £69,925 for public footpath upgrade works.

In May 2021, the Applicant increased their offer from 10 to 12 affordable houses (shared ownership), along with the POS and PROW contributions. The Applicant suggested an overage clause¹ and their offer was a sale rate hurdle of 10% above £201.06 per sq ft (their recent predicted net values).

The Council sought the services of a viability consultant in assessing the applicant's case from the outset. As required by PPG on Viability, negotiations have been taking place between the applicant, officers and their consultant, and in this case, such negotiations have taken place over 9 months in relation to the current application.

The Council was willing to consider the Applicant's on-site offer plus an overage, subject to a sales rate hurdle at an appropriate level with the aim of reaching a policy-compliant level of affordable housing over time.

Following a review, the £201.06 plus 10% (therefore circa £221) was found to be too high - if this level was accepted, the Council would be unlikely to receive any financial contribution from the overage clause as this is considerably higher than the applicant's current estimated sales values. The Council's advisor also found that if the applicant's current assessment of value was to be accepted, the development could in fact achieve more than 12 affordable houses on the site, thereby securing a greater level upfront, and needing to leave less to the overage clause.

In addition, the figure of £201.06 plus 10% was a net figure, whereas the Council disagreed, considering this should be a gross figure. Other elements of the Applicant's overage offer were also unacceptable to the Council, including that only 50% of the share of the uplift would go to the Council for affordable housing, rather than 100% of it. As set out in the PPG, *"Review mechanisms are not a tool to protect a return to the developer, but to strengthen local authorities' ability to seek compliance with relevant policies over the lifetime of the project"*.

The Council responded with a revised sales rate hurdle at £193.39 per sq ft which reflects the profit margin, benchmark land value and cost assertions in the Applicant's Financial Appraisal submitted with the application. The total contribution in the overage would amount to £1,012,750 to be spent on delivering a 50/50 split between social rent and shared ownership properties.

As demonstrated above, and as required by Planning Policy Guidance (PPG) on Viability, negotiations have been taking place between the applicant over the last 9 months in relation to the current application. However, by August 2021 the applicant made it clear to the Council that they would not accept the suggested overage and requested the Council determine the application.

Whilst it is positive to see that the Applicant has increased their offer throughout this process, it is disappointing that the details of the overage could not be agreed. The Council

¹ An overage clause can be used within a Section 106 Agreement, where a development offers contributions below the policy requirement to provide flexibility in the early stages of a development. The overage will seek to capture any enhancement in value of the project overtime, which will go towards funding the outstanding affordable housing contribution.

is advised that the Applicant's financial appraisal fails to meet the required tests (in PPG and the NPPF). In doing so, they failed to demonstrate that if further planning policy requirements for affordable housing were met, that the scheme would be undeliverable on viability grounds.

The Rossendale Borough Council Strategic Housing Market Assessment Update, undertaken by Lichfield's, and published March 2019 identifies a need for between 102 and 170 affordable homes a year in Rossendale for the period 2019 to 2034. The Borough is significantly underperforming against its affordable housing target. This study further demonstrates that the majority of affordable housing needs (about 70%) is for rented housing.

With this in mind, it is imperative that housing developments, particularly those proposed to be allocated in the emerging Local Plan, contribute to affordable delivery in line with Core Strategy Policy 4 and emerging Policy HS6, both in regards to tenure and amount. Therefore, whilst the application meets the necessary financial contributions for POS and PROW upgrades, the provision of 17% shared ownership affordable housing, (with a viability case that is not agreed) set against a policy requirement of 30% of which half should be social rent, does not comply with either the development plan or the emerging plan.

The allocation is expected to deliver housing within years 1-5 of the Local Plan. However, under the NPPF para. 68, as the Applicant argues the site is not economically viable now for a fully policy compliant scheme, it could be delivered later on in the Plan (6-15 years) as economic viability improves, as the Council currently has 8 years supply of housing.

Conclusion

S.38(6) of the Planning and Compensation Act 1991 requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise. That remains the starting point for decision-making.

Members refused the previous application (2019/0214) for one reason which encompassed the following issues:

- 1) Failure to provide a policy-compliant level of affordable housing;
- 2) Harm by way of the loss of open space / Greenlands;
- 3) Harm to the character of the area by reason of the urbanisation of the site; and
- 4) Harmful impact from biodiversity loss.

Since the previous application was determined, the emerging Local Plan, which allocates the site for housing, is at an advanced stage. The Council has a 5 year supply of land for housing and a report confirming this position is expected to be published imminently. However, the tilted balance has been applied in the determination of the application.

The application has been found to comply with the relevant housing policies of the adopted Core Strategy and the emerging Local Plan and is acceptable in principle. It is recognised that the delivery of 71 houses is an important contributor to the overall supply of land for housing. The site lies within the urban boundary, in a reasonably sustainable location, and is proposed to be allocated for housing in the emerging plan.

It is inevitable that the development of this greenfield site for housing will have an urbanising effect. However, taking into account the financial contributions towards

upgrading the adjacent public footpath and to the Hawthorn Way play area, coupled with the provision of on-site amenity greenspace and landscaping, officers consider that the applicant has addressed issues 2 and 3 of the previous reason for refusal. In regards to biodiversity, the application has committed to a number of biodiversity enhancement measures, which would be conditioned, and are acceptable to the Council's ecological advisor. With that in mind, officers consider that issue 4 has been addressed.

Moving on to issue 1, with reference to Policy 4 of the Core Strategy and HS6 of the emerging Local Plan, the application fails to provide a policy compliant level of affordable housing in terms of either amount or tenure. The provision of 17% (12 dwellings) affordable housing of a shared ownership tenure, set against a requirement for 30% (21 dwellings) of which 11 should be social rent, the application is not meeting its requirements, and is informed by a viability case that is not agreed.

The Council does not accept that the development cannot viably provide more than 12 shared ownership affordable homes or any social rented properties, either on-site or via an overage agreement. The shortfall from this site alone would harm the delivery of much needed affordable housing in Rossendale.

The application is contrary to the development plan, the emerging plan and the NPPF in this regard. The tilted balance does not affect this conclusion.

9. RECOMMENDATION

Refuse for the reason in Section 10.

10. REASONS FOR REFUSAL

1. The proposed residential development generates a requirement for affordable housing. The development provides for a level of affordable housing that is below that required by Policy 4 of the Rossendale Core Strategy and Policy HS6 of the emerging Local Plan, and a tenure that does not reflect the housing need. The financial viability case advanced by the applicant does not adequately justify the reduced level or tenure, and fails to meet the requirements of the National Planning Policy Framework and National Planning Practice Guidance. The proposal, therefore, conflicts with Policy 4 of the Rossendale Core Strategy, Policy HS6 of the emerging Local Plan and the National Planning Policy Framework.

[REDACTED]
[REDACTED]
15 October 2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.

- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair?
There were c 5,000 empty properties across the Valley(2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroomhouses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total

- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village

“Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue.

There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. **New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:**

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children's safety **IF** the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents.

The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection. My objection also stems from the fact that I was considering moving to the area as it is stunning but this development would definitely result in me looking elsewhere for property.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Christine Catlin

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

12/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

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Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

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The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

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Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Gillian Whitehead

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15th October 2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

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Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

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There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

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There are several objections within this area relating to the proposed development:

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*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

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On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

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I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Michael Bennett

Hi my name is
Chris Ashworth of [REDACTED] abs I object to the
swinshaw hall development. Many thanks Chris Ashworth
\

Add address

Add Date

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before

the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

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Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Subject: Ref MM009 H3 Swinshaw Hall- RBC Objection Letter

--

Caroline Mitchell

[REDACTED]

[REDACTED]



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester

Acres Brook, Sabden Road
Higham, Lancashire, BB12 9BL

Forward Planning Team,
Rossendale Borough Council,
Business Centre,
Futures Park,
OL13 0BB

www.cprelancashire.org.uk

By email: forwardplanning@rossendalebc.gov.uk

Patron
Her Majesty the Queen
President
Emma Bridgewater
Chair
Debra McConnell

15 October 2021

Dear Forward Planning Team,

I am responding on behalf of the Campaign to Protect Rural England (CPRE) Lancashire, Liverpool City Region and Greater Manchester to the Rossendale Local Schedule of Proposed Main Modifications to the Publication (Regulation 19) Draft Plan.

On the whole the Main Modifications do improve the local plan and we hope it can be adopted as soon as possible, as rural areas without an up to date local plan adopted are more vulnerable to speculative developments that are the least sustainable way to deliver development.

CPRE, the Countryside Charity

CPRE wants a thriving, beautiful countryside for everyone. We're working for a countryside that's rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency.

With a local CPRE group in every county, we're advocating nationwide for the kind of countryside we all aspire to, one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before.

We stand for a countryside that enriches all of our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate. For more information, please visit www.cprelancashire.org.uk.

Schedule of Proposed Main Modifications to the Publication (Regulation 19) Draft Plan

CPRE wants to see local plan enable true sustainable development principles to achieve well designed rural places, with adequate infrastructure to ensure a good quality of life for all in the future.

Climate emergency

We are amid an undeniable climate crisis, which is without doubt the most pressing issue our environment faces today. It is a material consideration; it is an emergency.

Please update the references to Climate 'Change' to Climate 'Emergency' throughout the Local Plan in recognition of the urgency for action when planning decisions are made, especially Policy 19 Climate Change and Low and Zero Carbon sources of Energy (ENV 8).

MM001 Spatial Strategy Portrait, MM040 Strategic Policy ENV1: High Quality Development in the Borough, MM048 Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality, ENV1 Climate change/energy efficiency, Strategic Policy TR1: Strategic Transport, MM056 Glossary also need to reflect the reality of the harm threatened by inaction.

The justification is that the Statutory Instrument 1056: Climate Change Targets, July 2019 now requires the net UK carbon account for the year 2050 to be lower than the 1990 baseline from original 80% to a current more ambitious 100% target. Boris Johnson made commitments to speed this up to 2038 at the recent Conservative Party Conference. CPRE will keep an eye on Government to ensure this promise occurs on the ground. The Local Plan should be up to date in this regard.

In addition, there is now a 6th Carbon Budget to rely on, see here for further information:

<https://www.theccc.org.uk/publication/sixth-carbon-budget/> and also note (amongst many other reports of interest!) the report on Local Authorities and the 6th Budget at [Local Authorities and the Sixth Carbon Budget - Climate Change Committee \(theccc.org.uk\)](#)

The Local Plan should not lack ambition on this issue as the environmental harm including flooding events, degradation of our natural capital and collapsing biodiversity needs more urgent action.

CPRE agrees that new development must therefore reduce our demand for carbon, such as car dependency by focusing development on previously used land in urban places, relying on rail and bus services, incorporating good networks for walking and cycling based on a '20-minute neighbourhood model'. All local facilities, including shops, schools, doctors and play parks should be within easy walking distance with surface treatment of pavements and public rights of way that can accommodate all users, including wheelchairs.

All opportunities to design in flood resilience with sustainable urban drainage and provide renewable energy, such as roof mounted solar and combined heat and power should be planned in at an early stage. Electric car charging points should be available for each home.

We should value our productive farmland for the vital services it provides. We support the protection of high-grade agricultural land as it is irreplaceable. Our younger generation should be able to sustain itself.

Allocated development sites impacting rural places should require developers to demonstrate how the development contributes in a positive way to local character, respecting heritage and cultural assets, including that of rural Rossendale. There should be an effort to design for local distinctiveness

CPRE undertook recent research evidencing how people have relied on exercise in local place for good health and well-being and we should value our greenspaces. Click here for more details: [Over two thirds want to see their local green space enhanced - CPRE](#)

MM001 Spatial Strategy Portrait

New employment and housing should be focused on existing towns following a hierarchy. Rural places should not be the focus of new development as it is unsustainable.

Brownfield sites should be used to delivery needed development. An amount of land for windfall should be incorporated. CPRE considers 30% of land allocated for housing is to be brownfield as low in ambition. When the North West Regional Strategy was in force the ambition was much higher. This appears counter to NPPF Section 11: Making Effective Use of Land. We seek a higher figure to make the most of the brownfield and underused land that exists across Rossendale.

MM026 Strategic Policy EMP1: Provision for Employment

CPRE disputes the figures quoted for the employment requirement as there is not enough evidence on the impacts of Brexit and Covid. The economic uncertainty has had a depressing impact on economic development and will continue for a number of years. Many people continue to work from home and increasingly shop on line. This has reduced the demand for a range of commercial property and it ought to be re-purposed. A sense check of the amount of land should be undertaken in view of continuing economic uncertainty.

The same applies to the housing requirement, which is too high. The Government's revised housing method for use by local planning authorities still relies on out-of-date ONS 2014 population data reliant on high growth rates. Although Rossendale's housing requirement is reduced, to 185 dwelling per annum (DPA) from 247 dpa in the adopted development plan, CPRE still argues the figure is too high and it means the Government is setting up Rossendale Council to fail against its stringent NPPF Housing Delivery Test (HDT). This will cause the loss of greenfields for unnecessary development. We believe local housing needs should be planned for and not developer demand. In fact, the HDT should be assessed on the more realistic lower figure meaning the Council has not underperformed to the same extent, if at all. Afterall the Council does not complete houses. That is the job of developers, and there is a conflict of interest as many developers have an interest in consent on greenfields. It has promoted greenfield before brownfield development.

CPRE believes the exceptional circumstance to release Green Belt are no longer justified.

Affordable Housing

CPRE is supportive of enough affordable housing being planned for in the local plan based on the Strategic Housing Market Assessment. We reject the Government's definition as it is not genuinely affordable. We think the local plan should specify affordable housing is more than market housing at 80% value as this is only affordable to a limited number at the first purchase and thereafter it ceases to provide genuinely affordable housing. It misses a vital rural housing type. We would encourage more rented housing to be developed in partnership with registered providers who have a long-term interest in providing decent housing standards.

MM004 Strategic Policy SD2: Urban Boundary and Green Belt

CPRE is concerned that Green Belt should be protected in the future and objects to the release of land in the Green Belt for development. Alternative sources of land should be fully considered. The

Duty to Cooperate may reveal that a more urban neighbouring authority could deliver some housing to take the pressure of the rural area. Developing houses in the Green Belt harms openness and the five Green Belt purposes.

We are pleased to see the Council is committed to protecting Green Belt for future generations. CPRE is proud of its countryside successes, including Green Belt planning policy, which was introduced due to the public concern over the harm being caused by unrestricted urban sprawl, merging of distinct towns, countryside encroachment, protecting heritage setting and supporting urban regeneration came about due to our work. Rossendale's Green Belt plays these important functions, and keeps land permanently open in a spatial and visual way for everyone's benefit and we would welcome any opportunity to add to the amount of designated Green Belt.

CPRE undertook recent research evidencing how people have relied on exercise in local place for good health and well-being and we should value our greenspaces. Click here for more details: [Over two thirds want to see their local green space enhanced - CPRE](#)

Green Belt must not be easily allowed for development, even in the context of the NPPF, which in our experience has led to an acceleration of Green Belt development (five times more than previously) despite Government promises to protect it.

Summary

CPRE wishes the team every success in achieving an adopted local plan that will support sustainable neighbourhoods offering protection and enhancement of rural places, and urban greenspace.

We need a high quality of life for people and wildlife of Rossendale in the future. Enhancing rural places and urban greenspace is for everyone's benefit, and new development should be planned in a considered way to achieve this.

Yours sincerely



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