Land West of Market St, Edenfield (H66) Revised Masterplan submitted by Taylor Wimpey (June 2023)

Responses Received



H66 Masterplan (Taylor Wimpey, 2023)



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FAO: Forward Planning Team, Rossendale Borough Council

Thank you for inviting National Highways to comment on the June 2023 version of the Edenfield Masterplan covering Local Plan housing allocation H66.

In terms of the Taylor Wimpey site subject to current application reference 2022/0451, our comments are set out in in detail within our current holding recommendation response to that application.

Whilst it may be an aspiration, it has not been established to use of SUDS is a suitable drainage strategy in relation to the topography, ground conditions and the adjacent A56, as set out within those comments. National Highways therefore looks forward to this aspect and the others we have raised being addressed in detail as part of the planning application consultation process.

If you would like to discuss anything about this email, please contact me.

Kind regards,

Warren Hilton, Assistant Spatial Planner Operations North West | National Highways | Piccadilly Gate | Store Street | Manchester | M1 2WD Web: www.nationalhighways.co.uk

For information and guidance on planning and the Strategic Road Network in England please visit:

https://nationalhighways.co.uk/our-work/planning-and-the-strategic-road-network-in-england/

Dear Sir or Madam,

I am writing on response to the Edenfield master plan from our Lord and Masters Taylor Wimpy.

First of all, why is this consultation in this month? This should be delayed until the summer holidays have finished. What is the rush? I respectfully ask that this consultation is stopped immediately and pushed back until September and October, running for 8 weeks.

This is the second time TW have put in consultations at times to make responses as difficult as possible. Why do you let them do it?

By the way are Peel and whoever else signatories to this? I know they weren't last time. If they aren't, dismiss it now.

TW want to build houses, it's their thing, however why do all the other residents of Edenfield have to suffer because of their desperate need to build?

Removing parking for many residents of Market Street is ludicrous, why should they suffer because of TW? House prices plummet, business suffer, people suffer (wagons within a Mette of their front windows!)

450 m or so of no parking? Really? About 80 cars, where do they go? So just throw that bit out please it's not tenable.

Making Exchange street one way, why do the residents of Highfield and Eden, which will become rat runs, have to suffer because of TW? It's madness and no sane person would even consider this.

That can go as well

The speed of traffic will increase beyond its current state (and it's bad) as the parking does help slow down traffic to an extent before it bursts through onto Bury Road and becomes a 50mph zone.

Removing said parking will also means Market street becomes a more tempting alternative to the bypass, which was built to take traffic away, now it will just be another fast road. TW want to build houses and if that's the case they should do it without changing on iota of the rest of Edenfield.

Negotiate with the Highways agency and get an exit off the bypass which makes any new development self contained and keeps cars away from the rest of us. Will they do that? No because it's so expensive and would destroy their profit. However It's a really alternative to the current idea of destruction of people lives and homes. Why is that never in these plans?

So work to have an exit from the bypass and build these houses from that. It's the easiest answer and makes it a long term viable housing project. Simple really of TW are willing to pay for it all. Start negotiations with highways now.

I note the greenbelt next to the school has yet again been allocated as parking. They can get stuffed, that can't happen and should be thrown out. Destroy another field for cars displaced by TW ridiculous plans.

There is no time frame of how long this will go on, if the council let it happen ? Years of wagons ruining the already dire roads on top of the Marshalls trucks? Are you as a local council really going to allow the utter devastation of people's lives? For how many years 5/6/7 or 10 maybe longer?

To me all of Rossendale council need to see this and get involved now. It's quite clear that the local plan is not fit for purpose, it's needs recalling, scraping and done again. A full council meeting to get this thing sorted out instead of TW trying to wear us down. Tell TW to go away until the council have pulled the plan and come up with a planB.

So much has changed since the local plan was imposed on us that we need to look again. Other councils around the country are doing that, so why not ours? Do the right thing and stop this mess now.

We have a right to stop this, if we live in any sort of democracy it should be stopped and stopped now.

Graeme McDonald



Robert McIntyre



I am against the revised masterplan and the proposed layout vechical Access to the proposed development is tottaly all wrong, currentley there are issues with traffic

Congestion on market street, which casues issues entering Exchange street The additional vehiclas will cause bottle necks through Market street, and where It is proposed no parking, where are owners to park, what about the elderly owners Who park out in front of the premises, there are issues with buses driving through Market street once again creating a bottle neck, how will this change regarding the new proposal

And the additional cars,

Lastley we have had to enjure the past 6 months every night with additional traffic going through Edenfield

Due to roadworks on the M66, how will the new proposal take into account future maintaince work on the M66

Regards

Good morning,

Having seen the recent plans for Exhange Street and Market Street and Anwyl Land I would like to object to these proposals.

Who is the proposal deemed to benefit and how?

There will be a detrimental affect on existing residents mental health and well being as well as the inconvenience of having nowhere to park near our houses.

I have mobility issues so being able to have access to my front door is crucial.

The flow of traffic on Market Street is significant and double yellow lines would compound the issue.

The value of our houses will be impacted.

This is not Okay.

Paula Munro



25th June, 2023.

Dear Mr. Atherton,

Taylor Wimpey's revised Local Plan

Having read all the correspondence relating to Taylor Wimpey's planning application; your reply and the above amendments to the Local Plan, I would like to make the following comments/observations please:-

- 1. The Local Plan should take into account the plans of ALL the four developers but this only addresses TW and Anwyl.
- 2. The Plan is to the detriment of Edenfield village as it stands. Apparently TW think they can use the land and roads to enable them to make a lot of money by displacing the residents in terms of car-parking spaces; a subsequent de-valuing of house prices and the closure of local businesses. To extend their car-parking spaces by THREE is laughable. Thirty-two cars will be displaced from parking outside their houses on Market Street. Clearly TW think Edenfield roads exist solely to give access to their housing estates
- 3. Peel/Northstone to turn the last remaining Green Belt field in Edenfield is unfair. This is the entrance to the village and to turn it into a car-park would be desecration; exceptional circumstances would have to be proved to do this.
- 4. Anwyl land Chatterton Hey field Exchange Street is already packed with residents' vehicles; shoppers and hiking groups who leave their cars there most days when setting off on their walks. To make Exchange Street one way would also increase substantially the traffic flow on Highfield Road, Eden Avenue and The Drive.

Edenfield residents have been fighting (through ECNF) to retain the unique character of the village of which we are very fond, but it has been and is a

constant battle to convince 'the powers that be' that these plans are not feasible.

Ever since the land was bought by the developers, brought out of Green Belt status and then the Local Plan was accepted by ALL the Labour Council members (with one abstention) in 2021 we have fought a very strenuous battle to retain the character of the village both in terms of time and money.

I urge you please to take into account the points I have submitted in this letter as part of your decision-making process.

Thank you.

Yours faithfully,



I wish to strongly object to the proposed masterplan in Edenfield.

I have lived in Edenfield for more than 6 years and the traffic situation has increased dramatically in that short time, with further developments it will get so much worse. A real danger for pedestrians and drivers alike. How can that possibly be avoided?

The proposed building is unacceptable and to take away the beautiful green belt space is terrible.

The parking is another great concern of mine.

I live on the main road with roadside parking. The proposed parking bays giving limited parking is a real problem for me. Will there be resident only parking??, adequate residential parking??

This proposed masterplan will effect so many people living in Edenfield and those wanting to pass through Edenfield. Surely there are other areas that can be built on – I understand that Edenfield is a desirable area to build and will generate high income for builders/council but it will ruin some peoples life... is it worth that?

Again I strongly object

Angela Ashworth

Sent from Mail for Windows

Dear Mr. Atherton,

Thank you for your letter of 28th. June advising of new Master Plan for the above mentioned land in Edenfield.

This new plan still does not include all the developers and has made small cosmetic changes to the traffic issues; in our view nothing has really changed. The objections in our letter of 3rd. December 2022 still stand and in common with virtually all residents of Edenfield we are still opposed to this development.

Yours Sincerely,

Phil and Elaine Johnson



Our ref:
Your ref:PL00791790
Your ref:BY email: forwardplanning@rossendalebc.gov.ukDate:6 July 2023

Dear Forward Planning Team

EDENFIELD MASTERPLAN CONSULTATION (H66)

Thank you for your email dated 16 June 2023 regarding the proposed Masterplan and Design Code

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

The site is allocated within the adopted Rossendale Local Plan. The heritage impact assessment and site policy sets out some requirements in the development of the site with regards the Historic Environment. Providing the content of the masterplan and design code appropriately considers the historic environment and mitigates for any harm in line with the Local Plan and our response to the planning application, then we have no additional comments to make on these documents.

Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the local and county level to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the masterplanning of the site. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER (formerly SMR). They will be able to provide you with the Historic Environment Records for the area including any relevant studies, and ensure a joined-up and robust approach is undertaken.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW HistoricEngland.org.uk Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Yours sincerely,

E.Hrycan

Emily Hrycan Historic Environment Planning Adviser (North West) Historic England



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW HistoricEngland.org.uk

Please note that Historic England operates an access to information policy. Correspondence or information which you send us may therefore become publicly available.



Hi there,

I would like to submit an objection to Taylor Wimpey's planning application to build new houses on their land in Edenfield.

I have a couple reasons why I have an objection;

Firstly, the traffic in Edenfield is already bad, and adding another hundreds and hundreds of vehicles associating with 400+ new houses would be a nightmare for the residents like us.

Secondly, we have children's play area and bike track on those small streets that have access to Taylor Wimpey's field. The play area is the only play area we have in this village, so all the children living in this village go there. Also we see a lot of children on their bikes on those streets attracted by the bike track. They are situated in the nice quiet neighborhood at the moment, so we see a lot of children go there on their own or with their friends.

Having hundreds of hundreds of more vehicles passing through those streets will not only affect the residents living on the streets but also affect our children's safety that's how I feel as a mother of a child. I won't feel safe to send my child to the bike track or park on his own or with friends when there would be a lot of vehicles passing through the streets.

Lastly, we live on the main road -Bolton road North and we hear the noise of the cars all the time it's really loud, and the house shakes when big vehicles pass by. I really don't think we will be able to stand how noisy it will be by adding hundreds and hundreds of vehicles on top of this because of those new houses.

For those reasons, I express my objections to Taylor Wimpey's Planning Application.

Kind regards,

Dear Sir/ madam

I am writing in objection to the above proposed plan to build new houses in Edenfield with new traffic regulations.

I live on market street and the new homes plus traffic limitations outside or near my house would seriously inpeed myself and my neighbours in not only parking outside our own homes but also increase the volume of traffic throughout an already busy road.

Why should I have to park away from home at a place dictated to by house developers ...especially walking with shopping to my abode.

The volume of traffic would be even worse as and when the A56 closes for whatever reason and traffic calming bumps would slow down a heavy traffic load through the village. To add yellow lines through market street is surely a puritanical attempt to appease traffic issues yet would mean residents especially older people walking a distance to park their vehicles. The whole exercise is for making money by developers without consideration to existing residents and traffic thorough fare.

To build proposed houses would mean a massive increase of vehicles throughout the village causing disturbance and nuisance. All of this will impact the quality of life for Edenfield and roads off and around market street for people who live here.

Please bear in mind heavy goods lorries diverting through the village when the by pass is closed.

I must strenuously object to plans submitted by developers and am in total disagreement with any form of expansion in Edenfield and also green belt land.

Yours sincerely Andrew Brimelow I am writing to you with my strong objection to any houses being built to the west of Market Street Edenfield, obviously you don't drive through here. The road isn't wide enough as it is with the Lorry's from the Quarys and the farm machinery always travelling through the village . If you put yellow lines on Market Street where will all those residents park ???? Maybe on the drive ways of all the new houses you propose, or block all the little side streets . I for one will be happy to glue my hands to the road in protest if any plans get passed . Go build these houses on brown belt land , massive site next to the Irwell in Ramsbottom or where Mayfield chick's was in Irwell Vale. Only way I would ever agree to houses being built is an entrance and exit road on the A56 Edenfield bye pass . I live on Bolton Road North and my house shakes every day because of dips in the road caused by quarry lorries . I have cracks in the brick work from front door to bedroom windows fron and back , any chance you can come and sort the road out and repoint the brick work on my house ?????

Edenfield resident born and breed at Michael james Sixsmith

Sent from Yahoo Mail on Android

Dear Sir/Madam

I have read the revised Edenfield Masterplan and would like you to record and respond to the following:

I have noted that the Bus Stop currently on Market Street, Edenfield at the entrance to the proposed development for the erection of 238 No. residential dwellings and all associated works including new access, lancscaping and public open spece within housing allocation H66 of the adopted rossendale local plan is to be relocated from its current site. I would like you to note my objection to this bus stop and its shelter being relocated in front of my property

1. It will obstruct my view.

2. It will inpinge on my privacy from people waiting for the bus or people who are disembarking and travelling on the bus

3. It will encourage people to sit on/damage my garden wall and fencing

4. The bus will cause an obstruction and limited the site view to vehicles existing Pilgrim Gardens

Can you please inform the appropriate authorities of my objection.

I would also like you to note that consideration be given to having a 20mph speed limit throughout the village of Edenfield to slow down the speeding traffic.

Susan Burgess



Edenfield Masterplan and Design Codes Consultation

Contact Details Planning and Development Team The Coal Authority 200 Lichfield Lane Berry Hill MANSFIELD Nottinghamshire NG18 4RG	
Planning Email: Planning Enquiries:	
Date 12 th July 2023	

Dear Forward Planning Team

Edenfield Masterplan and Design Codes Consultation

Thank you for your notification received on the 16^{th} June 2023 in respect of the above consultation.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records do not indicate the presence of any recorded coal mining features at surface or shallow depth within the Edenfield Masterplan area. On this basis the Planning team at the Coal Authority have no specific comments to make on this consultation.

Yours faithfully

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI Principal Planning & Development Manager In respect of the above application we would make the following comments:-

1. The so called "Masterplan" is not, and cannot be considered to be, a Masterplan in so far as it deals with only part of the H66 site and does not provide details of the proposed nature of the development of those areas outside its own specific boundary. Neither does it provide details of the planned phasing and timetable for implementation of the <u>total</u> development. The Taylor Wimpey proposals <u>cannot be considered in isolation</u> and therefore the application must be treated as invalid at this time.

2. The submission also seeks to address issues raised by the previous proposals, in particular relation to traffic. Specifically the 'new' information in relation to access to the M66 junction One, like the first traffic report, bears no resemblance to the lived reality of Edenfield residents ~ ie tailbacks and paralysis from even the smallest interruption to traffic flows. Last November minor roadworks (lasting several weeks) near this junction created rush hour chaos, with queues in the morning nearly back to the Duckworth Arms and in the evening tailbacks up the slip road onto the Motorway itself.

In relation to Market Street, the proposed site access and the suggested restrictions do nothing to alleviate existing problems let alone accommodate the inevitable huge increase in traffic travelling along it. Nor does an apparent increase of THREE parking spaces within the proposed development achieve anything meaningful for the dozens of displaced cars that currently park on the west side of Market Street.

More generally, earlier this year closures on Haslingden Road, Rawtenstall caused gridlock at Edenfield traffic lights demonstrating that any traffic flow problems within a three-four mile radius of the village directly impacts travel through it. This is dictated by the geography of the valley and reflects the decision to site such developments at the southern end of the borough. The prospect of another one to two hundred cars from the Taylor Wimpey proposals, coupled with another hundred + from the remainder of the H66 site, will ensure a daily diet of traffic chaos, environmental blight and a complete reduction in the existing quality of life.

3. The submission also purports to allay fears about the flood risk and overall safety of the site and proposed development. In fact it raises serious concerns about the impact on the A56, the very real danger of flooding and the potential instability of the site and adjacent areas. These issues do not appear to have been adequately addressed and could have life-threatening consequences.

4. The "pick and mix" approach taken to the proposed housing types, presumably selected from the developers standard portfolio, will result in a totally inappropriate development in terms of type, appearance and scale. The proposed choice of cheap and unsympathetic materials is highly detrimental and the extensive range indicated will negate any sense of overall balance and unity. The unimaginative and banal proposals do not respond to, or accord with, the existing village and will produce a bland, nondescript development, the ubiquitous nature of which is displayed in speculative building all over the country to its, and our, detriment.

5. It is irresponsibly absurd that the continued production of outmoded, outdated and backward looking housing, as typified by the developers' proposals, takes no cognisance of,

or even begins to address, the climate crisis that, as we are daily reminded, is hugely exacerbated by human activity.

Dr. Ann-Marie Coyne M J Coyne Dipl.Arch(Dist) RIBA

Sent from my iPad

Further to comments already submitted I wish to refute the implications concerning the Edenfield Community Neighbourhood Forum in Taylor Wimpey's application. Contrary to Taylor Wimpey's assertion, the Forum has striven to build constructive relationships with all stakeholders and meets regularly with the local council and its planners. The rather snide remarks in their proposals reveal only how much they fear a coherent, co-ordinated community response that highlights the inadequacy and, indeed, dangerous possibilities of their proposed development. It also reveals their cynicism, lack of environmental awareness and failure to accept their architectural responsibilities to the existing community.

Regards Ann-Marie Coyne Sent from my iPhone

Hi

Thank you for consulting the GMEU

I previously commented on the 19th December 2022. The amended plan appears to have taken on board my previous representation. I should also note that I have been in further discussions with representatives of one of the developers since my last comment with regards biodiversity net gain.

Biodiversity Net Gain

I note that the need to comply with national requirements for biodiversity net gain has been included. I have been in discussion with one of the developers who concedes that 10% net gain on-site may prove difficult and that off-site mitigation will most likely be required. I would recommend that if the masterplan is adopted that it includes the identification of off-site receptors preferably grasslands within Edenfield.

Other Wildlife

I note and welcoment that the need to mitigate and enhance for wildlfie such as nesting birds and bats is now mentioned. As previously noted I recommend this targets appropriate colonial bird species for the locality based on survey evidence of what species are present in the locality.

Planting Palette

This appears to have been amended in line with my previous recommendations. I have no further comments at this time.

David Dutton <u>Ecologist</u> Planning Planning and Transportation Place

<u>Tameside MBC</u> | <u>Twitter</u> | <u>Facebook</u> | <u>Instagram</u> | <u>LinkedIn</u> Dukinfield Town Hall | King Street | Dukinfield | Tameside | SK16 4LA

Tel. Mobile.

This email was sent at a time & date convenient to the sender; please do not feel under any pressure to respond immediately if this is outside your normal working hours.

Email Disclaimer http://www.tameside.gov.uk/disclaimer

Dear sirs

I'm writing to strongly object to the above proposed planning application.

I have two major concerns. I live on Market St and currently park outside my house when there is space.

On the plans (which are v hard to read), it refers to many parking restrictions on Market St. It is already quite difficult to park near my home on occasions (particularly when the Drop Of Cafe is open) so where would I park if there are new parking restrictions put in place? And would the cafe clients be allowed to park in parking areas, which would restrict even further residential parking. Can the change in parking on a main road be legal if it means that residents end up with nowhere to park near their home having previously had parking? (And of course there would be many more vehicles in the area with all the new houses planned)

Also the unavoidable massive increase in traffic would bring noise/dust/ pedestrian hazardschildren going to and from the Primary School, people crossing the rd etc.

My second major concern is directly connected to my property.

The proposed building would come right up to my back-garden wall- currently it is GREEN BELT fields behind me. I have many questions should this go ahead. How near would the house behind me be? Where would the windows face in relation to my garden? Would I be overlooked? How high would the houses behind be? Would the house immediately behind my garden have a fence within the building criteria?, or a grassy mound ? These are all of great concern to me.

Would a screen be erected whilst building is taking place? What about the total disruption, dust and noise - would we receive any compensation for that?

This proposed plan would affect me, my neighbours and my property greatly and I appreciate that Edenfield would be an attractive financial opportunity for builders and council as it is a v desirable area, but this would be at a great cost to the residents and the village. New houses are needed but there are many other areas that could be an alternative surely.

Yours sincerely

Angela Ashworth

Sent from my iPad



FOA Rossendale Borough Council Phone: Email:

Your ref: Draft Masterplan for Land West of Market Street – Edenfield (Allocation H66)

Date: 13th July 2023

Dear Sir/Madam

Lancashire County Council's School Planning Team welcomes the opportunity to comment on the draft Masterplan for Land West of Market Street – Edenfield (Allocation H66). We have provided comments below.

The draft Masterplan identifies the following requirements for education at as per the Local Plan allocation:

Provision will be required to expand either Edenfield CE Primary School or Stubbins Primary School from a 1 form entry to a 1.5 form entry primary school, and for a secondary school contribution subject to the Education Authority. Land to the rear of Edenfield CE Primary School which may be suitable is shown on the Policies Map as 'Potential School and Playing Field Extension'. Any proposals to extend the schools into the Green Belt would need to be justified under very special circumstances and the provisions of paragraph 144 of the NPPF.

We welcome the inclusion of the maps detailing the potential land available for school expansion. Can we please note, however, that the plans on pages 7, 23,55 and 51 seem to also include the current school playing field as Peel L&P land. For clarity, it may be best to only include the additional land available, rather than the current school playing field.

As this Masterplan notes, there are a number of land owners and developers across the strategic site. As the local planning authority has identified a number of housing developments which should be treated collectively as a strategic site, with an aggregated requirement for additional school land, Lancashire County Council would expect the local planning authority to set out their expectations for the strategic site in their Masterplan and assist in the negotiations to secure the additional school land to accommodate the collective impact of the applications.

Where the demand is generated by more than one development or phase, it may be that one developer would be required to provide the school land to address the collective demand. This would require applicants to provide a contribution towards the

Lancashire County Council

PO Box 100, County Hall, Preston, PR1 0LD

cost of the school site land, proportionate to the size of their development. Lancashire County Council would seek to work with local planning authorities to ensure that such equalisation arrangements are established prior to the approval of any of the developments affected to ensure that the development 'hosting' a new school or providing additional school land is not disadvantaged. Planning applications have been submitted prior to masterplan adoption and an understanding of how the land will be provided and funded across the strategic site is not clear within the current draft masterplan. The masterplan should clarify these matters, as there has been no collective agreement on this position. It would be useful for further detail to be provided in the document regarding the mechanisms to achieve the provision of the school land to the authority an no cost.

School Place requirement

The impact and requirements of this development on school places should be considered in relation to the wider impact in the area once applications are submitted. This requirement will be kept under review as the strategic site detail emerges.

Surplus Places

The demand identified in the sections below does not take into account any surplus places that may be available when development may come forward. The scale of additional places required may be reduced in areas where there are projected to be surplus places. As planning applications are submitted any forecasted surplus within the catchment of the development will be taken into account.

Pupil Yield

For the purposes of the site analysis, we have assumed that all of the developments would be four bedroom dwellings. This is in line with LCC's Education Contribution Methodology for assessing the impact of Outline planning applications and reassessed at Reserved Matters application stage taking into account more accurate bedroom information.

Primary Place Demand

Primary Planning Area	Dwellings	Pupil Yield	Scale of Demand
Ramsbottom	400	152	1 Form of Entry

Based on a 4 bedroom pupil yield the following additional place need has been identified:

Primary 152 places

Secondary Place Demand

	Dwellings	Pupil Yield	Scale of Demand
Total	400	60	0.5 Form of Entry

Based on a 4 bedroom pupil yield the following additional place need has been identified:

Secondary 60 places

LCC's School Planning Team look forward to further liaison with Rossendale Borough Council to determine how the education requirements from the impact of the Masterplan site will be mitigated. If you have any questions, please do not hesitate to contact me.

Yours Faithfully

David Cahill

- > > >

School Planning Team Lancashire County Council Dear Sir/madam,

We wish to strongly object to the above planning application on the grounds of (1) Traffic concerns and (2) Drainage concerns and flood safety risk.

With regards to traffic concerns, we live on Market Street which is already highly congested. The proposed additional houses will exacerbate this problem and make access through the village almost impossible.

The proposed compensatory carpark does not appear to be large enough to accommodate existing residents for which double yellow lines are proposed outside their houses.

Yours faithfully

Stephen and Carole Higginbotham -

Dear Sir/madam,

I wish to strongly object to the above planning application on the grounds of (1) Traffic concerns and (2) Drainage concerns and flood safety risk.

With regards to traffic concerns, I live on Market Street which is already highly congested. The

proposed additional houses will exacerbate this problem and make access through the village almost impossible. Have you tried driving down the road when just the bypass is closed for a few hours? The village can not accommodate so many more vehicles these new houses will bring.

The proposed compensatory carpark does not appear to be large enough to accommodate existing residents for which double yellow lines

are proposed outside their houses. And why should they have to walk a distance from their houses that many people will have lived in for years just so that 'new' people gain access to their homes which will all have parking facilities on their doorsteps.

Yours faithfully Elizabeth Dalby

Sent from my iPhone

Planning@rossendalebc.gov.uk

Location: Land West of Market St, Edenfield

Proposal: Full application for the erection of 238 residential dwellings and all associated works, including new access, landscaping and public open space.

I am writing this letter to vehemently express my objection to the revised plans and documentation in respect of the above proposed development (Edenfield Masterplan and planning application 2022/0451). As a concerned resident of Edenfield, I firmly believe that this development plan poses serious safety concerns and fails to adequately address the well being and needs of existing residents. I urge you to carefully consider the points outlined below, as they have significant implications for the safety, accessibility and quality of life in our community.

- 1. Safety Concerns Regarding the New Junction Entrance on Market St. The proposed site access on Market St as a new junction entrances raises serious safety concerns. Market St is already a highly trafficked road and serves as a National Highways Diversion route when the A56/M66 experiences closures. The safety measures proposed do not appear to be sufficient and will not meet the requirements for a development of the proposed scale. Insufficient visibility and the potential risk to the lives of residents, cyclists and primary school children (located just 250m from the junction) are of the utmost concern. The necessity of a road safety audit has been mentioned, yet it has been disregarded. By neglecting to address these safety concerns, Lancashire County Council and RBC may potentially breach their responsibility to ensure the safe day to day life of all residents in Edenfield.
- 2. Double Yellow Lines and Accessibility for Current Residents. The introduction of double yellow lines in front of our houses raises concerns about us current residents and how will we access our properties with shopping and young children. The proposed compensatory car park is neither sufficiently large nor fit for purpose. A recent audit has identified between 35-40 cars parked every single night, suggesting that the car park is open to new and existing residents, rendering it non-compensatory. Moreover, the lack of spaces for visitors, tradespeople and services, as well as the absence of electric charging points, further exacerbates the issue. Restrictions on parking will also negatively impact local businesses. This plan demonstrates discrimination against existing residents to accommodate the needs of residents in new houses.
- 3. Lack of Comprehensive Masterplan and Phasing Proposal. A significant concern is the absence of a comprehensive masterplan that incorporates the input of all developers or a clear phasing proposal for the TW site. The lack of these essential elements suggests that it could potentially be one big building site for the next 10 years, causing traffic congestions, pedestrian safety hazards, and a decline in the overall quality of life for residents. It is imperative that a comprehensive Masterplan and phasing proposal be established to minimise disruptions and ensure the safety and well being of all residents throughout the development process.
- 4. Inadequate Crossing Points. The proposed plan includes only one crossing point on the north side of the junction, which raises serious safety concerns for the very young

primary school children (including my own) crossing Market St from the south side. This lack of adequate crossing points poses a significant risk to their safety.

5. Overall Flood Risk. There appears to be an overall flood risk, particularly on the A56, leading to severe traffic and safety concerns. These risks should be thoroughly evaluated and addressed before any approval can be considered.

I kindly request your acknowledgement of this objection.

Thank you for your attention to these critical concerns. I trust that you will give due consideration to the objections raised and act in the best interests of our community and make decisions that prioritise the safety and well being of all residents of Edenfield.

Yours sincerely Tim Preston

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Masterplan Address and Site: Land West of Market Street, Edenfield, Lancashire For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam,

The revised plans must be rejected in their entirety for the following reasons:

1) Unsuitability - Highways

At present, traffic approaching from Rawtenstall travelling towards Bury meets traffic from Haslingden/Helmshore/Irwell Vale at the traffic lights on Market Street near the CoE Primary School. At the traffic lights one can take a sharp left to Rawtenstall or, pass the school and drive along Market Street to the Mini Roundabout at the other end of Market Street. Here one can take a left exit to Rochdale or go straight on to Bury with the possibility of a right turn after approx. 100m down Bolton Road North to Stubbins and Ramsbottom. Please Note: Traffic from 3 directions meeting at the Mini Roundabout on Market Street. At the other end, the Junction at the Traffic Lights on Market Street near the Primary School is a) very busy b) very close to Edenfield Primary School c) totally 'parked up' in all directions during the School Run A 'LolliPop' Person assists children and parents to cross safely in front of the school. It is a very busy and rather dangerous crossing. The roads are narrow and parked up at the best of times. Along come buses, lorries, cars and bicycles, carefully negotiating a path through the happy throng in between the parked cars and people dashing across the street. When there are problems on the nearby Haslingden By-Pass or the M66, traffic is redirected through Market Street. More traffic. To date, Edenfield Residents and the surrounding houses are aware of the situation and practise patience and understanding during those difficult times. There have been few incidents, if any. People living on Market Street park their cars in front of their houses. Edenfield cannot absorb a housing development and the inevitable additional traffic, irrespective of the 'Revised Masterplan' from Taylor Wimpey. People are happy to live in this old village with the charming landscape at the rear of their houses. Please be reminded: It is a Green Belt Area! There are Playing fields, Bridle Paths and Footpaths down into the valley and up into the hills. A rare spot of rural living and a haven for children. It must not be destroyed, and a Green Belt Area used for a housing development which can go on Brown Field Sites.

PLEASE Stop this Development.

2) Unsuitability due to increased risk of Flooding

The impact of the planned development will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton and as far as Stubbins and Ramsbottom. The change in our weather pattern (Global Warming) with long spells of drought followed by increased rain and rain storms is a serious danger to those communities. Severe flooding occurs more and more frequently. The combination of surface water and the rivers Irwell and Ogden combine to form an Irwell Vale Torrent in severe weather and constitute a considerable flood risk to the lives and living space of the people in those villages. The ongoing efforts of the Environment Agency and their report on "Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme" are commendable and appreciated, but are way off target. The aforementioned Housing Development Plans in Edenfield will further aggravate and contribute to the flooding problems caused by additional surface water. Some of my neighbours in Irwell Vale can testify to the terrifying experience of flooding caused by additional surface water from the hills.

<u>Please, for our and our children's future – say NO to the planned development</u>

Thank you.

Anne and Steven Morrison

Your Reference: Allocation H66 Revised Masterplan & Design Codes

Location: Land West of Market Street, Edenfield, Lancashire

Re-Consultation in respect of a Revised Masterplan & Design Codes submitted by Taylor Wimpey in association with planning application reference number 2022/0451 - A proposed development for the erection of 238 No. residential dwellings (Use Class C3) and all associated works, including new access, landscaping, and public open space within housing allocation H66 of the Adopted Rossendale Local Plan.

Dear Sir / Madam

I write in connection with the above Revised Masterplan application. I have examined the re-submitted masterplan, and I know the H66 site well as I live in the village. I wish to object strongly to the adoption of this revised masterplan on the following basis:

 The Re-submitted June 2023 masterplan by Randall Thorp (with additional work by Eddisons) on behalf of Taylor Wimpey and Anwyl Land accompanying Taylor Wimpey's planning application falls far short of the necessary requirements in that it does not include all developers or <u>comprehensive plans</u> for the entire H66 site, as stipulated clearly in the current Adopted Rossendale Borough Council Local Plan (SEE BELOW)

EXCERPT FROM Appendix_1_Adopted_Local_Plan_Final_10_Dec_2021.pdf

H66 – Land West of Market Street, Edenfield

Development for approximately 400 houses would be supported **provided that:**

1. The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing.

2. The development is implemented in accordance with an agreed design code.

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 Rostron Arms. Measures to assist pedestrian and vulnerable road users will be required; 4. **A Heritage Statement and Impact Assessment is provided**, and suitable mitigation measures are identified and secured to conserve, and where possible, enhance the setting of the Church, the non-designated heritage assets which include Chatterton Hey (Heaton House), Mushroom House, and the former Vicarage, and the other designated and non-designated heritage assets in the area;

5. Specific criteria for the design and layout needs to take account of:

i. Retention and strengthening of the woodland enclosures to the north and south of the Church

ii. The layout of the housing parcels should be designed to allow views to the Church to continue

iii. The relationship of the new dwellings to the Recreation Ground to ensure safe non-vehicular access is provided

iv. Public open space to be provided along the woodland area south of the brook/Church enclosure v. Landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development and provide a buffer to the new Green Belt boundary

vi. Materials and boundary treatments should reflect the local context

6. An Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts particularly on the Woodland Network and stepping stone habitat located within the site.

7. Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4

8. Geotechnical investigations will be required to confirm land stability and protection of the A56, and consideration paid to the suitability or not of sustainable drainage systems on the boundary adjoining the A56

9. Provision will be required to expand either Edenfield CE Primary School or Stubbins Primary School from a 1 form entry to a 1.5 form entry primary school, and for a secondary school contribution subject to the
Education Authority. Land to the rear of Edenfield CE Primary School which may be suitable is shown on the Policies Map as 'Potential School and Playing Field Extension'. Any proposals to extend the schools into the Green Belt would need to be justified under very special circumstances and the provisions of paragraph 144 of the NPPF;

10. Noise and air quality impacts will need to be investigated and necessary mitigation measures secured. 11. Consideration should be given to any potential future road widening on the amenity of any dwellings facing the A56.

Explanation

120 Exceptional circumstances have been demonstrated to support the release of this land lying between the A56 and Market Street in Edenfield from the Green Belt. The area is very open in character and allows views of the surrounding hills and moors and will require a well-designed scheme that responds to the site's context, makes the most of the environmental, heritage and leisure assets, and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements.

121 Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a Masterplan is prepared.

122 Edenfield Parish Church is Grade II* and development would have to consider the effect of the development on the significance of the heritage asset and should safeguard the setting of the designated heritage asset located within close proximity to the site allocation. There are several non-designated heritage assets located within close proximity of the site allocation and other designated and non-designated heritage assets located in the area. Development would have to consider the effect of the development on the significance of these heritage assets and should safeguard the setting of the heritage assets.

123 Sensitive landscaping using native species will be required in order to provide a suitable buffer to the new Green Belt boundary. Any biodiversity improvements should be directed to this landscaped area as well as to the mature woodland, identified as a stepping stone habitat.

124 Due to the removal of the site from Green Belt it is necessary that there are compensatory improvements to the Green Belt within the local area in accordance with SD4 in particular these should relate to proposals identified at Edenfield Cricket Club and Edenfield and Stubbins Schools. Compensatory measures could also be directed towards footpath and cycleway improvements in the vicinity as set out in the Council's Green Belt Compensation Document.

125 Any proposed development must make a positive contribution to the local environment and consider the site's form and character, reflecting the setting of features such as the Grade II* Listed Edenfield Parish Church and incorporating appropriate mitigation. Development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance. The development must contribute towards the sustainable use of resources. Implementation of development must be in accordance with an agreed Design Code/Masterplan across the whole development. The layout should be designed to allow glimpsed views towards the Church to continue, for example, by aligning the principle road(s) along a northsouth or north east – south west axis, and building heights restricted.

126 In light of the site's natural features and relationship to surrounding uses, development is likely to come forward in a number of distinct phases. The infrastructure associated with the overall development and each individual phase will be subject to the production of a phasing and infrastructure delivery schedule to be contained in the Masterplan. Site access will be a key consideration.

127 Development proposals will be subject to a Scoping Study, a Transport Assessment and Travel Plan. This must be agreed with Lancashire County Council. Appropriate measures must be put in place to address any impacts the development may have on the strategic and local road networks. A Travel Plan will seek to ensure that the development promotes the use of public transport, walking and cycling.

128 **A Health Impact Assessment** will be required to maximise the overall benefits of the scheme to intended residents.

129 An Appropriate Assessment under the Conservation of Species and Habitats should be undertaken to address any impact on the Breeding Bird Assemblage for the South Pennine Moors.

130 A geotechnical study will need to confirm that there will be no adverse impacts on the A56. The suitability of providing a Sustainable Drainage System will need to be considered too as National Highways consider that storing water on site may not be advisable. National Highways may wish to widen the A56 and further discussions with National Highways are advised and if this is possible, this should be addressed by a suitable site layout plan to address this.

131 Edenfield Primary School is operating close to capacity and there is no capacity at Stubbins Primary School. The preferred course of action of the Education Authority would be to expand Edenfield CE Primary School onto adjacent land to the rear, provided that any access issues can be overcome, or at Stubbins Primary School.

In short :

- The re-submitted 'masterplan' still does not include the whole site, as all landowners of H66 are not represented
- The re-submitted 'masterplan' still does not meet the requirements of the local plan (as above), and still does not adequately IN DETAIL, address issues like traffic and flood risk. The detrimental impact to existing residents along both Market Street and Exchange Street, as well as the knock on effects to the rest of the village will be immeasurable. Increased traffic, loss of parking and amenity along with the added noise and pollution as well as loss of ancient stone field boundaries and green space will only detract from the appeal of the village.
- The re-submitted 'masterplan' still does not include the entire site and does not adequately address IN DETAIL, concerns about phasing and development timescales.
- The re-submitted 'masterplan' is still not in keeping with the character of the village and still does not IN DETAIL, address concerns about ecology, drainage, and the full impact on the environment. It is clearly weighted towards the developer in an attempt to push the plans and planning application through the planning system.
- The re-submitted 'masterplan' still does not address the fact IN DETAIL that there are not enough school places or local services to support the level and density of this development.

Edenfield is a small village settlement on the outskirts of the Rossendale Valley where development proposals should be considered very carefully. The protection of Edenfield's visual, historic, and archaeological qualities needs to be maintained, and the revised National Planning Policy Framework states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. I would suggest that this revised 'masterplan' in it's present form fails to take the opportunities available for improving the character and quality of Edenfield and the way it functions. As such it should be rejected.

An alternative Masterplan for H66 is being developed in consultation with the community (Edenfield Community Neighbourhood Forum) and until such time as this is finalised AND APPROVED, I believe **any** masterplan application or planning application on H66 should be recommended for refusal.

I understand that the Edenfield Community Neighbourhood Forum as well as many of my neighbours living in the village of Edenfield share my concerns.

In its current form, this revised masterplan or any planning application associated with it should not proceed to a planning committee meeting, however if this application is to be decided by councillors in its current form, please take this as notice that I would like to speak at the meeting of the committee at which this application is expected to be decided. Please let me know as soon as possible the date of this meeting.

Yours faithfully

Jason Straccia

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 - Edenfield Masterplan Address and Site: Land West of Market Street, Edenfield, Lancashire For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam

The revised plans must be rejected in their entirety for the following reasons:

1) Unsuitability - Highways

At present, traffic approaching from Rawtenstall travelling towards Bury meets traffic from Haslingden/Helmshore/Irwell Vale at the traffic lights on Market Street near the CoE Primary School.

At the traffic lights one can take a sharp left to Rawtenstall or, pass the school and drive along Market Street to the Mini Roundabout at the other end of Market Street.

Here one can take a left exit to Rochdale or go straight on to Bury with the possibility of a right turn after approx. 100m down Bolton Road North to Stubbins and Ramsbottom.

Please Note: Traffic from 3 directions meeting at the Mini Roundabout on Market Street.

At the other end, the Junction at the Traffic Lights on Market Street near the Primary School is a) very busy

b) very close to Edenfield Primary School

c) totally 'parked up' in all directions during the School Run

A 'LolliPop' Person assists children and parents to cross safely in front of the school. It is a very busy and rather dangerous crossing. The roads are narrow and parked up at the best of times. Along come buses, lorries, cars and bicycles, carefully negotiating a path through the happy throng in between the parked cars and people dashing across the street.

When there are problems on the nearby Haslingden By-Pass or the M66, traffic is re-directed through Market Street. More traffic.

To date, Edenfield Residents and the surrounding houses are aware of the situation and practise patience and understanding during those difficult times. There have been few incidents, if any.

People living on Market Street park their cars in front of their houses.

Edenfield cannot absorb a housing development and the inevitable additional traffic, irrespective of the 'Revised Masterplan' from Taylor Wimpey.

People are happy to live in this old village with the charming landscape at the rear of their houses. Please be reminded: It is a Green Belt Area!

There are Playing fields, Bridle Paths and Footpaths down into the valley and up into the hills. A rare spot of rural living and a haven for children. It must not be destroyed, and a Green Belt Area used for a housing development which can go on Brown Field Sites.

PLEASE Stop this Development.

2) Unsuitability due to increased risk of Flooding

The impact of the planned development will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton and as far as Stubbins and Ramsbottom. The change in our weather pattern (call it Global Warming?) with long spells of drought followed by increased rain and rain storms is a serious danger to those communities. Severe flooding occurs more and more frequently. The combination of surface water and the rivers Irwell and Ogden combine to an Irwell Vale Torrent in severe weather and constitute a considerable flood risk to the lifes and living space of the people in those villages.

The on-going efforts of the Environment Agency and their Report in "Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme" are appreciated, but are way off target. The aforementioned Housing Development Plans in Edenfield will further aggravate and contribute to the flooding problems caused by additional surface water. Some of my neighbours in Irwell Vale can testify to the terrifying experience of flooding caused by additional surface water from the hills.

Please, for our and our children's future – say *NO to the planned development* Thank you.

Jayne Bartram

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Masterplan Address and Site: Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

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Please, for our and our children's future – say NO to the planned development

Thank you.

Justin Packman

- To: forwardplanning@rossendalbc.gov.uk
- Cc: <u>anne.cheetham@lancashire.gov.uk</u>
- Cc: <u>scottsmith@rossendalebc.gov.uk</u>

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Masterplan Address and Site: Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

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- a) very busy
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Please, for our and our children's future - say

NO to the planned development

Thank you.

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451

Edenfield Masterplan

Address and Site: Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam,

The revised plans must be rejected in their entirety for the following reasons:

1. <u>Unsuitability – Highways</u>,

At present, traffic approaching from Rawtenstall travelling towards Bury along Burnley Road (B6527), meets traffic from Haslingden/Helmshore/Irwell Vale at the traffic lights on Blackburn Road (B6527) and Market Street, near to Edenfield CoE Primary School.

Approaching Edenfield from Blackburn Road at the traffic lights one can take a sharp left to Rawtenstall or turn right past the school and drive along Market Street to the Mini Roundabout at the junction of Rochdale Road (A680).

Here one can take a left exit to Rochdale or go straight on to Bury with the possibility of a right turn after approx. 100m down Bolton Road North (A676) to Stubbins and Ramsbottom.

Please Note: Traffic from 3 directions meeting at the Mini Roundabout on Market Street. At the other end, the Junction at the Traffic Lights on Market Street near the Primary School is

a) very busy

b) very close to Edenfield Primary School

c) totally congested 'parked up' in all directions during the School Run. A School Crossing Patrol Person assists children and parents to cross Edenfield Road safely in front of the school. It is a very busy and rather dangerous crossing. The roads are narrow, with a cars parked on both sides of the road with a constant heavy flow of traffic. The situation is further aggravated by the volume of buses, heavy goods vehicles along with vans, cars and bicycles, all negotiating a route along Edenfield Road in both directions, alongside pedestrians going to and from school.

When there are problems on the nearby Haslingden By-Pass or the M66, traffic is re-directed through Market Street which has a huge impact on an even higher volume of traffic. To date,

Edenfield Residents and the surrounding houses are aware of the situation and practise patience and understanding during those difficult times. There have been few incidents, if any. People living on Market Street park their cars in front of their houses. Edenfield can't absorb a housing development and the inevitable additional traffic, irrespective of the 'Revised Masterplan' from Taylor Wimpey.

Residents are happy to live in this old village with the charming landscape at the rear of their houses. **Please be reminded**: It is a Green Belt Area! There are Playing fields, Bridle Paths and Footpaths down into the valley and up into the hills. A rare spot of rural living and a haven for children. **It must not be destroyed,** and a Green Belt Area used for a housing development which can go on Brown Field Sites. **PLEASE Stop this Development**.

2. Unsuitability due to increased risk of Flooding

The impact of the planned development will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton and as far as Stubbins and Ramsbottom.

The change in our weather pattern (Global Warming) with long spells of drought followed by increased rain and rain storms is a serious danger to these communities. Severe flooding occurs more and more frequently. The combination of surface water and the rivers Irwell and Ogden combine to an Irwell Vale Torrent in severe weather and constitute a considerable flood risk to the lives and living space of the people in these villages.

The ongoing efforts of the Environment Agency and their Report in "Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme" are commendable and appreciated, but are way off target.

The aforementioned Housing Development Plans in Edenfield will further aggravate and contribute to the flooding problems caused by additional surface water. We can personally testify to the terrifying experience of flooding in Irwell Vale on more than one occasion, caused by additional surface water from the hills.

Please, for our and our children's future – say NO to the planned development.

Kind Regards Theresa Salmonese and Matthew Cassidy,

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Masterplan - Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam

The revised plans must be rejected for the following reasons:

1) Unsuitability - Highways

At present, traffic approaching from Rawtenstall travelling towards Bury meets traffic from Haslingden/Helmshore/Irwell Vale at the traffic lights on Market Street near Edenfield CoE primary school.

At the traffic lights one can take a sharp left to Rawtenstall or, pass the school and drive along Market Street to the Mini Roundabout at the other end of Market Street.

Here one can take a left exit to Rochdale or go straight on to Bury with the possibility of a right turn after approx. 100m down Bolton Road North to Stubbins and Ramsbottom.

Please Note: Traffic from 3 directions meeting at the mini roundabout on Market Street.

At the other end, the Junction at the traffic lights on Market Street near the Primary School is

- a) very busy
- b) very close to Edenfield Primary School
- c) totally 'parked up' in all directions during the school run.

A 'LolliPop' Person assists children and parents to cross safely in front of the school. It is a very busy and rather dangerous crossing. The roads are narrow and parked up at the best of times. Along come buses, lorries, cars and bicycles, carefully negotiating a path through the happy throng in between the parked cars and people dashing across the street. When there are

problems on the nearby Haslingden By-Pass or the M66, traffic is re-directed through Market Street. More traffic.

Edenfield residents and the surrounding houses are aware of the situation and practise patience and understanding during those difficult times. There have been few incidents, if any. People living on Market Street park their cars in front of their houses.

Edenfield cannot absorb a housing development and the inevitable additional traffic, irrespective of the 'Revised Masterplan' from Taylor Wimpey. People are happy to live in this old village with the charming landscape at the rear of their houses.

Please be reminded: It is a Green Belt Area! There are Playing fields, Bridle Paths and Footpaths down into the valley and up into the hills. A rare spot of rural living and a haven for children. It must not be destroyed, and a Green Belt Area used for a housing development.

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The impact of the planned development will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton and as far as Stubbins and Ramsbottom. The severe change in our weather pattern with long spells of drought followed by increased rain and rain storms is a serious danger to those communities. Severe flooding occurs more and more frequently. The combination of surface water and the rivers Irwell and Ogden combine to an Irwell Vale torrent in severe weather and constitute a considerable flood risk to the life's and living space of the people in those villages.

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Please say NO to the planned development

John and Mo Marriott

To: forwardplanning@rossendalebc.gov.uk

Cc: <u>anne.cheetham@lancashire.gov.uk</u>

Cc: <u>scottsmith@rossendalebc.gov.uk</u>

CC: jamesdalgleish@rossendalebc.co.uk

Rossendale Borough Council, Futures Park, Bacup, Rossendale OL12 OBB

20 July 2023

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Masterplan Address and Site: Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam

The revised plans must be rejected in their entirety for the following reasons:

1) Unsuitability - Highways

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PLEASE Stop this Development.

2) Unsuitability due to increased risk of Flooding

The impact of the planned development will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton and as far as Stubbins and Ramsbottom. The change in our weather pattern (call it Global Warming?) with long spells of drought followed by increased rain and rain storms is a serious danger to those communities. Severe flooding occurs more and more frequently. The combination of surface water and the rivers Irwell and Ogden combine to an Irwell Vale Torrent in severe weather and constitute a considerable flood risk to the lifes and living space of the people in those villages.

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Please, for our and our children's future - say

NO to the planned development

Thank you.

Objection from

Name and Signature:

Address:

Dear Sirs, please find herein my comments and objections to the Masterplan:

- 1. The traffic survey appears to predict that all three of the proposed development will produce exactly the same "Trip Rate", which I find confusing. I feel this needs further explanation for the layman.
- 2. The traffic survey predicts 234 two-way trips per morning peak and 265 two way trips per evening peak. That works out at 998 individual trips IN ADDITION to those already occurring. NO MENTION is made of the figure for current trips, so no proper judgement as to the disruption can be made.
- 3. "It should be noted that the route planning software indicates that, for the TW and Northstone sites, development traffic travelling to/from destinations to the north via the A56 would access the A56 by travelling north along the B6527 to the A56/A680 junction rather than via the Edenfield roundabout." No mention is made of SOUTHBOUND trips, yet logic and experience suggests that most new residents would be making heading for Bury and Manchester rather than Burnley or Blackburn.
- 4. The proposed parking bays and No Parking at any Time on Market St near the proposed junction towards the TW development are aimed purely at ENABLING the development, not easing current parking and access problems. The proposed facilities will do mothing to improve these, but instead penalise current residents of market street in that area.
- 5. The proposed One-Way system on Exchange ST similarly only serves to enable the development, and penalises current residents by depriving them of their current option of using either Exchange St or Highfield Rd.
- 6. Furthermore, the proposed One-Way does nothing to alleviate the parking problems already extant on Exchange St.

I reserve the right to add to these comments before the deadline of July 31st

Geoff Blow

Sent from Mail for Windows

Dear Sirs, please find herein my comments and objections to the Masterplan: NB Points 1- 6 are copied from my earlier objection 23/07/23

- 1. The traffic survey appears to predict that all three of the proposed development will produce exactly the same "Trip Rate", which I find confusing. I feel this needs further explanation for the layman.
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- 6. Furthermore, the proposed One-Way does nothing to alleviate the parking problems already extant on Exchange St.
- 7. Having read the PLACES MATTER Masterplan & Design Code, Edenfield Reference: PM_2023_009, I am struck by the recurrent negative comments made by the panel about the Taylor Wimpey review. The panel criticises **almost every aspect** of the review, namely the style, character and materials of the dwellings, the vison of the development, the sustainability of the designs, the need for noise abatement measures between dwellings (Not needed anywhere else in the village), the lack of a Sense of Place in the development, the lack of both green and blue infrastructure, the "arbitrary and unclear" arrival point at Market St, the uncomfortable connection from the existing village to the new development, the narrowness of the noise abating boundary with the A56, the lack of variety in the designs and usage of the proposed dwellings, the "suburban (as opposed to rural village) attitude", the poor quality of the materials proposed *, and the fact that whole aspects of the Design Code have been omitted from consideration. This last, in particular, begs the question as to whether Taylor Wimpey are a fit company to be entrusted with any development, if they play fast and loose with the requirements made of them. One might even think that they consider the matter a done deal and that they will get their development no matter what.
- 8. * With regard to the standard of the materials to be used, one only has to look at the Reedsholme development between Rawtenstall and Crawshawbooth: the show-houses on the front of the site are of stone brick, whilst those away from the road are very lacklustre brick. Even so, they are clearly not built as affordable housing, due to their size and the number of bedrooms in them.
- 9. On the subject of affordable housing, I can find no mention of any attempt by Taylor Wimpey to either increase or ensure the number of affordable dwellings proposed. As I stated I my previous objection, the intention to provide affordable housing "subject to viability" is disingenuous at best, but appears hypocritical and arrogant.

10. Likewise, I find no mention of any consideration to review the plan to allocate some part of the development to the iniquitous and unfair "Buy to Let" market, but which is also, thankfully, fast losing its appeal as interest and mortgage rates make it less profitable. Hopefully, any dwellings allocated to this market can be allocated to the affordable housing contingent, if indeed this ill-thought-out. Insensitive and unnecessary development goes ahead. In the light of Mr Gove's recent pronouncement, perhaps TW would like to reconsider and build in an inner city location instead?

In short, I object strongly to the application on the grounds of poor planning, disregard of local residents' interests, low standards of design and materials, and inappropriateness to the locality. Yours sincerely Geoff Blow

Sent from Mail for Windows

EDENFIELD MASTERPLAN/ TAYLOR WIMPEY PLANNING APPLICATION 2022/0451 Objections.

This revised Masterplan submitted by Taylor Wimpey is still not a Masterplan of the combined developers as requested by RBC. Nevertheless, it would inevitably affect the whole of Edenfield, so I urge you to consider my objections in that light.

I object to the revised Masterplan and Planning application 2022/0451 for the following reasons; The scale of the proposed development, the alterations to the existing village deemed necessary by TW to facilitate the development, and the estimated duration of works until completion will all have a huge detrimental impact on the village, the viability of businesses and the health and welfare of existing residents.

The Size of the Development

There has always been development in the village. Small developments incorporated into the village, refreshing the availability of housing stock, with minimal disruption, without affecting the look and feel of the village.

To double the size of the village with, as has been described, "Standard house types (are) proposed with poor design quality, poor artificial materials, lacking distinction" laid out in one large estate the full length of Edenfield will obviously transform the village completely, and disrupt the whole area for years to come.

Infrastructure required for such a development is being ignored.

Despite the number of houses proposed the site is poorly designed, very cramped and with very few green spaces, trees or landscaped areas.

I urge you to refuse the large number of houses proposed.

Traffic

Doubling the size of the village will inevitably mean trebling the number of cars parking, driving around and through the village. That is on top of all the usual traffic driving through the village, to and from work, shopping, visiting relatives and friends, or being diverted off the bypass when there's a hold up or accident on the bypass.

One detail now included in the revised masterplan are the proposed "mitigation measures to increase flow though the village", namely double yellow lines along Market Street/ Exchange St.

Parking in front of terraced housing is imperative for residents to access their properties with shopping, deliveries, young children, emergencies or if they are elderly or infirm. It is a commonly accepted feature in all areas with terraced housing. In a semi-rural area such as this, especially with a lack of a good public transport service, cars are relied on. I am sure none of us living on Market St would have contemplated buying

our properties without parking to the front. Alternative parking was requested by RBC. However, it is not clear where exactly that would be Also, the "compensatory" car park is not large enough and not fit for purpose – recent audit identified between 35 and 40 cars parked every night; the car park appears to be open to new and existing residents therefore can't be compensatory; no spaces for potential trades/service personnel; no future proofing e.g. electric charging points; no disabled provision.

Since these proposed measures have been highlighted I have been advised that were they to go ahead an application for compensation should be considered due to the reduced appeal and devaluation of my property and inconvenience.

Parking is essential for existing businesses too for their customers and suppliers. A decrease in footfall will result in Edenfield losing essential shops and services. It will have a negative effect on the local economy – the opposite of what was promised in the Local Plan

I urge you not to discriminate against existing residents and businesses to accommodate the needs of residents of new houses. I urge you to refuse these "measures"

Air Pollution, Safety and Flood Risk

With twice the housing and at least treble the number of vehicles in the village there will be a steep rise in air pollution generally. There will inevitably be a spike in reduced air quality around the entrance to the estate from Market st., the only access to the site and, a pinch point heavily used by cars and pedestrians especially during rush hour. Dangerous for children walking to school.

Many houses will be located very close to the bypass. Residents will suffer from air and noise pollution.

Proposed new junctions are unsafe and not fit for purpose

Serious traffic, cycle and pedestrian safety concerns could result in fatality

No road safety audit, despite this being raised as a concern on several occasions-

I do not believe the traffic proposal would pass a road safety audit

Flood risk overall but particularly on the A56 leading to serious traffic and public safety concerns – still awaiting national highways feedback

The above objections are in addition to my objections to Taylor Wimpey's initial submission.

I urge you to refuse Taylor Wimpey's revised submission.

Liz Stooke

Mr William Finney

Wednesday, 19 July 2023

For the attention of Mr Mike Atherton Chief Planning Officer Rossendale Borough Council Futures Park Bacup Rossendale OL13 0BB

Edenfield Masterplan/Taylor Wimpey Planning Application 2022/0451

Dear Sirs,

I write to express my serious concerns about the revised masterplan for Edenfield linked to the planning application by Taylor Wimpey.

The vehicular access to my property is via a cul-de-sac off Highfield Road. Access to the cul-de-sac is at the bottom of The Drive. Without any alternations to the village road layout. this is already a problematic junction to navigate either on foot or by vehicle. Cars frequently speed down The Drive and swing left down Highfield Road. There have been many occasions when I have nearly been involved in a road traffic accident while I have been stationary checking safe egress from the cul-de-sac. Again, without any changes to local roads surrounding the area(s) planned for housing development the existing residents of Eden Avenue, Highfield Road and including my own neighbours on Bolton Road North have to park on the road outside their houses as this is the only parking they have available. This already makes it difficult to navigate the footpaths as the cars are always parked across them. When I attempt to walk up to the children's play area with my family members and dogs we are forced onto the main road as we cannot walk, let alone push a pram through the gaps that are left. With the current flow of traffic on these roads, this is not a significant problem. Add another 300 houses and an equal number of cars, all of which you are going to force down these roads to gain access to their houses would have a seriously detrimental impact on the safety of the existing residents of this community.

Two members of my family have already had road traffic accidents at the junction of Eden Avenue, attempting to turn right onto Bolton Road North. These plans will make all the surrounding areas busier, and it is more likely that accidents numbers will increase. Recent road works on the A56 demonstrate the effect of a high number of vehicles attempting to travel through the village on its only road. Gridlock.

In addition to above, the plans to make Exchange Street a one-way system are ludicrous. Travelling down Exchange Street leads to the children's playground, the recreation ground, and the new pump track. The number of children on bicycles in this area has increased 10fold. To force traffic onto Highfield Road and Eden Avenue to navigate around a one-way Exchange Street will lead to a fatality. Exacerbate this with double yellow lines on Market Street and Exchange Street with restricted parking again will force additional vehicles onto Highfield Road and Eden Avenue. I am struggling to understand how anyone can think these are satisfactory solutions to provide access to a new housing development. It has no regard whatsoever for the existing residents of Edenfield Village. It has no regard for the safety of our residents, our children, or our community.

That is without even considering the impact on the village itself. Of the few shops that remain, these plans are likely to force their closure as customers will not easily have access to them during their opening hours.

The Masterplan as it currently exists provides no real detail about the overarching plan. What are the proposals for the Anwyl site? Is this where you plan to push the existing residents to park or is this exclusively for the new build homeowners? Are you considering further release of greenbelt areas? Has there been a road safety audit carried out? What about the existing natural habitats for wildlife, will these just be destroyed to accommodate houses?

I believe that this is a seriously ill-thought-out Masterplan, lacking in any detail which leads me to wonder about the intelligence of the authors or their home location. I would be interested to know if they live in Edenfield village? I think perhaps not. This is not a Masterplan for existing Edenfield residents this is a plan thought out by Rossendale Borough Council to boost council tax income which no doubt will be spent in other areas of Rossendale. Edenfield is too close to the boundary for Greater Manchester for any funds or services to head in our direction. You only have to ring 999 for police or ambulance services to experience that or wait for it to snow and see how long it takes for the roads to be gritted or even just take a walk around the village and look at the state of the roads and footpaths. Our public transport services are almost non-existent – Edenfield is the forgotten village. Until of course you want to buy a house here – inflated prices because of its idyllic location and picturesque scenery. Until that is you allow over 450 new houses to be built, declassification of greenbelt land to accommodate it and a village with little infrastructure to accommodate its existing residents let alone add more.

This is not a Masterplan for the residents of Edenfield, this is more likely to be a funeral plan. Either for the death of our village community or one of our children. I guess the choice is yours.

Yours faithfully,



CC: Scott Smith



Mrs Tracy Finney

Wednesday, 19 July 2023

For the attention of Mr Mike Atherton Chief Planning Officer Rossendale Borough Council Futures Park Bacup Rossendale OL13 0BB

Edenfield Masterplan/Taylor Wimpey Planning Application 2022/0451

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Yours faithfully,

Tracy Finney, MSc, Chartered MCIPD, MInstLM

CC: Scott Smith

Kieron Finney

Wednesday, 19 July 2023

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CC: Scott Smith



- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: scottsmith@rossendalebc.gov.uk

20 July 2023

- Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Masterplan
 - Address and Site: Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam

The revised plans must be rejected in their entirety for the following reasons:

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Please, for our and our children's future - say

NO to the planned development

Thank you.

Objection from

Nikola + Stephen McAulty

Name and Signature:

Address:

- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: scottsmith@rossendalebc.gov.uk

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Name and Signature:

William à fanet house,

Address:

- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: scottsmith@rossendalebc.gov.uk

20 July 2023

3.1

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Objection from

Name and Signature:

Glona DEADJ

Address:

- To: forwardplanning@rossendalbc.gov.uk
- Cc: <u>anne.cheetham@lancashire.gov.uk</u>
- Cc: scottsmith@rossendalebc.gov.uk

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Objection from

NICOLA PROCTOR

Name and Signature:

Address:

- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: scottsmith@rossendalebc.gov.uk

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Thank you.

Objection from

Name and Signature: Kim RATHMILL

Address:



DOMINIC RATHMILL

- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: scottsmith@rossendalebc.gov.uk

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Objection from

Name and Signature:

Address:

e Donna Tickle Garth Tickle



- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: scottsmith@rossendalebc.gov.uk

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Objection from

Name and Signature: Beverley J Flynn

Address:





- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: <u>scottsmith@rossendalebc.gov.uk</u>

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Name and Signate	ure:	
Address:		

- To: forwardplanning@rossendalbc.gov.uk
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Objection from	June	Bailey.	
Name and Signa	ture:		
Address:			
*			



- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: scottsmith@rossendalebc.gov.uk

20 July 2023

- Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Masterplan
 - Address and Site: Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam

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Please, for our and our children's future - say

NO to the planned development

Thank you.

Objection from	MAYA	BUCHANAN	9	CHIRIS	PICKUP
Name and Signat	ture:				
Address:					

Miss M Farrell



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To date, Edenfield Residents and the surrounding houses are aware of the situation and practise patience and understanding during those difficult times. There have been few incidents, if any.

People living on Market Street park their cars in front of their houses. Edenfield cannot absorb a housing development and the inevitable additional traffic, irrespective of the 'Revised Masterplan' from Taylor Wimpey. People are happy to live in this old village with the charming landscape at the rear of their houses.

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Thank you.

Yours faithfully

Michelle Neary



rocondalebe

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Objection from Name and Signature: DAVID FULHAM Address: 1 an a regular Bus user who troveds through Edenfrield, which is a buge bottlenede. What is proposed is only going to make matters much worse. Especially the micreared number of cars where the upperformed is totally miadequate. 80

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Objection from LUIS CLEMENTS

Name and Signature:

Address:

sture:			

Authorigh I wie in whilefield I do travel through Edenfield and an concerned that this addional development will result in further travel problems in Edenfield and inconvenience residents to a imbearable degree.

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- To: forwardplanning@rossendalbc.gov.uk
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Rossendale Borough Council, Futures Park, Bacup, Rossendale OL12 OBB

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Thank you.

Objection from

Name and Signature:

PH SIMBERT

Address:

MMBBET #



vosendalebe

- To: forwardplanning@rossendalbc.gov.uk
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Name and Signature:	GILLIAN	PARKER	
Address:			

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Objection from

Name and Signature:

Address:

CHRISTINE	RYDGR
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Objection from

Name and Signature:

Keith + Ann Richards

Address:

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c) totally 'parked up' in all directions during the School Run

A 'LolliPop' Person assists children and parents to cross safely in front of the school. It is a very busy and rather dangerous crossing.

The roads are narrow and parked up at the best of times, this is also a bus route, a route used by many delivery vans and lorries and large articulated HGV waggons and trailers (in part as Marshalls

quarry is also accessed further down the road in).

Access is already hazardous for cars let alone motor bikes and cyclists who carefully have to negotiate a path through between the parked cars and people dashing across the street near the school.

When there are problems on the nearby Haslingden By-Pass or the M66, traffic is redirected through Market Street creating more traffic congestion.

People living on Market Street park their cars in front of their houses both sides of the road effectively already making this a one lane only road.

Edenfield cannot absorb a housing development and the inevitable additional traffic, irrespective of the 'Revised Masterplan' from Taylor Wimpey.

2) Unsuitability due to increased risk of Flooding

The impact of the planned development will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton and the wider areas of Stubbins and Ramsbottom.

The change in our weather pattern (Global Warming) with long spells of drought followed by increased rain and rain storms is a serious danger to those communities.

Severe flooding occurs more and more frequently. The combination of surface water and the rivers Irwell and Ogden combine to an Irwell Vale torrent in severe weather and constitute a considerable

flood risk to the lives and living space of the people in those villages.

Whilst the on-going efforts of the Environment Agency and their Report in "Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme" are appreciated, they do not resolve the current situation

let alone an increase in housing and reduced flood plane areas.

The aforementioned Housing Development Plans in Edenfield will further aggravate and contribute to the flooding problems caused by additional surface water. Many of my neighbours

in Irwell Vale can testify to the terrifying experience of flooding caused by additional surface water from the hills and the rivers breaching their banks.

Please be reminded that this proposed development is currently a Green Belt Area.

There are Playing fields, Bridle Paths and Footpaths down into the valley and up into the hills. A rare spot of rural living and a haven for many species of wildlife.

With both main stream political parties making promises that they will protect our green belt, this development surely goes against this promise? This is particularly galling when there are numerous

Brown Field sites locally that would be better placed to be used for housing. Green Belt areas and in this case the additional flood planes must be preserved.

I strongly oppose this development and revised planning application and ask that you work on our behalf and say <u>NO</u> to the planned development.

Thank you in advance.

Wendy Steadman-Callander

Copy sent to: <u>anne.cheetham@lancashire.gov.uk</u> scottsmith@rossendalebc.gov.uk

Our Ref:	69781	
Your Ref:		
Date:	25 July 2023	
Please ask for:	Helen Leach	
Direct Line:		
Fax:		
E-Mail:		

Electronic or fax service of Legal documents is not accepted

Dear Sir/Madam

Proposal: Article 18 consultation from Rossendale Council (ref: 2022/0451): Revised masterplan and design codes associated with full application for the erection of 238 no. residential dwellings and all associated works, including new access, landscaping and public open space within housing allocation H66 of the adopted Rossendale local plan.

Location: Land west of Market Street, Edenfield

This application has now been considered and this Authority **RAISES NO OBJECTION** to the proposal.

I would ask that you give every consideration to any representations you have received from residents of Bury when you assess the acceptability or not of the scheme.

Yours faithfully

The Development Management Team

Miss Deborah Kenyon

Wednesday, 19 July 2023

For the attention of Mr Mike Atherton Chief Planning Officer Rossendale Borough Council Futures Park Bacup Rossendale OL13 0BB

Edenfield Masterplan/Taylor Wimpey Planning Application 2022/0451

Dear Sirs,

As a resident of Edenfield I write to express my serious concerns about the revised masterplan for Edenfield linked to the planning application by Taylor Wimpey.

Without any changes to local roads which surround the area(s) planned for housing development some of the existing residents of Market Street, The Drive, Eden Avenue, Highfield Road, Exchange Street and Bolton Road North have to park on the road outside their houses as this is the only parking they have available. This already makes it difficult to navigate the footpaths as the cars are always parked across them. When I attempt to walk up to the children's play area with my family members and my dog we are forced onto the road as we cannot always walk on the footpaths, let alone push a pram through the gaps that are left. With the current flow of traffic on these roads, this is not a significant problem. Add another 300 houses and an equal number of cars at least, all of which you are going to force down these roads to gain access to their houses would have a seriously detrimental impact on the safety of the existing residents of this community.

Two members of my family have already had road traffic accidents at the junction of Eden Avenue, attempting to turn right onto Bolton Road North. These plans will make all the surrounding areas busier, and it is more likely that accidents numbers will increase. Recent road works on the A56 demonstrate the effect of a high number of vehicles attempting to travel through the village on its only road. Gridlock.

In addition to above, the plans to make Exchange Street a one-way system are ludicrous. Travelling down Exchange Street leads to the children's playground, the recreation ground, and the new pump track. The number of children on bicycles in this area has increased 10fold. To force traffic onto Highfield Road and Eden Avenue to navigate around a one-way Exchange Street will lead to a fatality. Exacerbate this with double yellow lines on Market Street and Exchange Street with restricted parking again will force additional vehicles onto Highfield Road and Eden Avenue. I am struggling to understand how anyone can think these are satisfactory solutions to provide access to a new housing development. It has no regard whatsoever for the existing residents of Edenfield Village. It has no regard for the safety of our residents, our children, or our community. Highfield Road and Eden Avenue will become a car park for the visitors to the park, playing field and pump track, not to mention all the cars which will be doing U turns at the end of Highfield Road and Exchange Street which is right in front of the pump track.

That is without even considering the impact on the village itself. Of the few shops that remain, these plans are likely to force their closure as customers will not easily have access to them during their opening hours.

The Masterplan as it currently exists provides no real detail about the overarching plan. What are the proposals for the Anwyl site? Is this where you plan to push the existing residents to park or is this exclusively for the new build homeowners? Are you considering further release of greenbelt areas? Has there been a road safety audit carried out? What about the existing natural habitats for wildlife, deer are just one I can mention will these just be destroyed to accommodate houses?

I believe that this is a seriously ill-thought-out Masterplan, lacking in any detail which leads me to wonder about the intelligence of the authors or their home location. I would be interested to know if they live in Edenfield village? I think perhaps not. This is not a Masterplan for existing Edenfield residents this is a plan thought out by Rossendale Borough Council to boost council tax income which no doubt will be spent in other areas of Rossendale. Edenfield is too close to the boundary for Greater Manchester for any funds or services to head in our direction. You only have to ring 999 for police or ambulance services to experience that or wait for it to snow and see how long it takes for the roads to be gritted or even just take a walk around the village and look at the state of the roads and footpaths. Our public transport services are almost non-existent – Edenfield is the forgotten village. Until of course you want to buy a house here – inflated prices because of its idyllic location and picturesque scenery. Until that is you allow over 450 new houses to be built, declassification of greenbelt land to accommodate it and a village with little infrastructure to accommodate its existing residents let alone add more.

This is not a Masterplan for the residents of Edenfield, this is more likely to be a funeral plan. Either for the death of our village community or one of our children. I guess the choice is yours.

Yours faithfully,

Deborah Kenyon

CC: Scott Smith

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- To: forwardplanning@rossendalbc.gov.uk
- Cc: anne.cheetham@lancashire.gov.uk
- Cc: scottsmith@rossendalebc.gov.uk

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 **Edenfield Masterplan** Address and Site: Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam

The revised plans must be rejected in their entirety for the following reasons:

1) Unsuitability - Highways

At present, traffic approaching from Rawtenstall travelling towards Bury meets traffic from Haslingden/Helmshore/Irwell Vale at the traffic lights on Market Street near the CoE Primary

At the traffic lights one can take a sharp left to Rawtenstall or, pass the school and drive along School. Market Street to the Mini Roundabout at the other end of Market Street.

Here one can take a left exit to Rochdale or go straight on to Bury with the possibility of a right

turn after approx. 100m down Bolton Road North to Stubbins and Ramsbottom. Please Note: Traffic from 3 directions meeting at the Mini Roundabout on Market Street.

At the other end, the Junction at the Traffic Lights on Market Street near the Primary School is

- a) very busy
- b) very close to Edenfield Primary School
- totally 'parked up' in all directions during the School Run c)

A 'LolliPop' Person assists children and parents to cross safely in front of the school. It is a very busy and rather dangerous crossing. The roads are narrow and parked up at the best of times. Along come buses, lorries, cars and bicycles, carefully negotiating a path through the happy throng

in between the parked cars and people dashing across the street. When there are problems on the nearby Haslingden By-Pass or the M66, traffic is re-directed through Market Street. More traffic.

To date, Edenfield Residents and the surrounding houses are aware of the situation and practise patience and understanding during those difficult times. There have been few incidents, if any.

People living on Market Street park their cars in front of their houses. Edenfield cannot absorb a housing development and the inevitable additional traffic, irrespective

of the 'Revised Masterplan' from Taylor Wimpey. People are happy to live in this old village with the charming landscape at the rear of their houses. Please be reminded: It is a Green Belt Area!

There are Playing fields, Bridle Paths and Footpaths down into the valley and up into the hills. A rare spot of rural living and a haven for children. It must not be destroyed, and a Green Belt Area used for a housing development which can go on Brown Field Sites.

PLEASE Stop this Development.

2) Unsuitability due to increased risk of Flooding

The impact of the planned development will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton and as far as Stubbins and Ramsbottom. The change in our weather pattern (call it Global Warming?) with long spells of drought followed by increased rain and rain storms is a serious danger to those communities. Severe flooding occurs more and more frequently. The combination of surface water and the rivers Irwell and Ogden combine to an Irwell Vale Torrent in severe weather and constitute a considerable flood risk to the lifes and living space of the people in those villages.

The on-going efforts of the Environment Agency and their Report in "Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme" are commendable and appreciated, but are way off target.

The aforementioned Housing Development Plans in Edenfield will further aggravate and contribute to the flooding problems caused by additional surface water. Some of my neighbours in Irwell Vale can testify to the terrifying experience of flooding caused by additional surface water from the hills.

Please, for our and our children's future - say

NO to the planned development

Thank you.



Hello, I would like to object to the proposed Masterplan and Design Code for Edenfield put forward by Taylor Wimpey on the following grounds on behalf of myself and Katie Simoson: >

> 1. Contrary to the site specific particulars for H66 as set out in the local plan this is not a comprehensive Masterplan covering the whole of H66 by all landowners / developers.

> 2. This has been solely developed by and for the benefit of Taylor Wimpey who a trying to railroad this development through and wasting the Local Authority and general publics time and money.

> 3. The proposals on traffic are a serious health and safety concern and there is no site wide traffic or road safety assessment.

> 4. Details on infrastructure for example schools, healthcare provision are once again ignored and kicked down the road - the whole point of a Masterplan is that these issues can be addressed and we don't end up in a situation where they are forgotten about 5-10 years down the line.

> 5. The Masterplan lacks any detail on drainage, floodrisk, ecology, power.

> 6. The use of SUDS is not developed and unclear whether it is viable.

> 7. The Masterplan proposes the release of more green belt land to facilitate a car park that is only required to counter the increased amounts of traffic caused by the development- I mean you literally could not make this stuff up.

> 8. The proposals to remove parking is preposterous and will significantly impact upon people's livelihoods for the benefit of some mythical person. Surely as residents who pay council tax year in year out our needs and benefits should come before the needs of future residents. The idea to remove parking outside local shops will result in the loss of business and ultimately force shops to close, great so then we will all have to get in our cars which are now parked half a mile away and drive 3 miles down the road to get a loaf of bread.

> 9. The idea of having an entrance to an enormous housing estate along a tiny lane with an infants play park and recently installed pump track is a health and safety disaster waiting to happen, I wouldn't want to be the person that signed that decision off.

> 10. There is no phasing plan and the MP talks of simultaneous development.

> 11. This nonsense needs to be put to bed once and for all as the development quite simply is not achievable.

>

> Thank you

>

> I would like to object to the planning app 2022/0451 quite simply on the grounds that there is not an agreed Masterplan in place for site H66.

>

> The are serious safety concerns in relation to traffic and access into the site.

>

> There is active discrimination against exiting residents many who are elderly and frail with the proposals to remove parking from outside their properties.

>

> Flood risks are a huge concern - paving over greenfields a natural soak away and pumping water into the existing over burdened drainage network is not addressed.

> I am struggling to understand why there is even a consultation on a planning application when there is no agreed MP. This is quite simply trying to cause confusion to the general public and overwhelm and already understaffed and overworked planning department.

>

> Thank you

> David and Katie (extremely concerned residents)
> Sent from my iPhone
David Rawcliffe BSc (Hons) MRICS
Associate Director

Dear Sir/Madam

I wish to communicate to you my concerns about the planned developments for Edenfield. I am an Edenfield resident, living at

Firstly, I am disappointed that Rossendale Borough Council has seen fit to release green field sites in Edenfield for development, when there are alternative brown field sites available elsewhere within the borough boundary.

I have a general concern about the scale of the planned housing developments, which if fully adopted, would double the size of the village, without a corresponding provision in amenities, or satisfactorily addressing traffic management problems. Plans would lead to an additional 1000 vehicles, given access onto roads which are already struggling with congestion and parking issues.

I also have some specific concerns around the Anwyl development (H66 site: south) which directly affects my locality:

• Serious safety concerns about proposed one way system Exchange Street. The left hand turn from Market Street to Exchange Street is a blind left turn which is a danger for traffic, pedestrians and cyclists.

• Serious safety concerns junction Highfield Road/Exchange Street – particularly child, pedestrian and cycle safety, as directly opposite to the cycle pumptrack (which is not detailed in either the masterplan or planning application).

• Serious safety concerns re the proposed access to the site via The Drive, Highfield Road, Eden Avenue. Visibility is severely affected by double parking. Narrow roads (and wider cars) lead to pavement parking. This already creates a risk for pedestrians and for children who play on the streets. These side roads are unsuitable for serving significant additional traffic.

• Double yellow lines proposed on Market Street and Exchange Street and restricted parking 8am until 6pm. This will undoubtedly result in reduced footfall to local businesses. I am related to Michael Cook the village butcher. He tells me that on-road parking (despite it's other problems) is absolutely essential to the running of his business. The introduction of yellow lines would close his shop.

• Double yellow lines in front of houses. How will current residents access properties with shopping, luggage, babies and young children?

• No indication of who the proposed additional parking on the Anwyl site will service. Is this compensatory parking for existing residents unable to park on the streets? Is it for new residents? How will it be controlled?

I would ask that all the issues raised above be considered in relation to the planning proposals.

Yours sincerely

Nicholas J Bury

To Whom it May Concern,

I am writing to raise my objection to the recent updated planning application by Taylor Wimpey (TW). Here are some of my reasons.

There is still no comprehensive masterplan from all developers.

I am very concerned about the proposed restriction of parking for current residents of the village which I feel is extremely discriminatory. Displacing current residents in order to accomodate the needs of residents in the new build is not only unfair but morally wrong. Even if the additional parking proposed were suitable in its location and size to offset this which I don't believe it is, it presumably would not be monitored and therefore will end up being used, not by the residents affected, but future residents of TW homes and their visitors.

I am concerned about the proposal to make Exchange Street one way and the subsequent impact on additional traffic via Eden Avenue and Highfield Road. At the moment both of these roads make driving challenging as visibility is affected due to double parking. Potentially this could have a future knock on effect as a result of increasing traffic. I can envision parking restrictions for residents in those areas also. Again this could be seen as discriminatory as future residents of a new build will not have to put with these levels of traffic and nor will they have issues around safety for children who play in the streets, (as a result of increased traffic). I already have my concerns of a possible design flaw of the recently installed pump park with children flying out on to the road even before additional traffic!

I haven't seen a road safety audit, but the amount of documentation we are expected to get through to make informed decisions could mean that I have missed it. I would like to see this to ensure safe day to day living for residents,

There is little parking restrictions for local businesses at the moment, parking restrictions could seriously affect this and subsequently the local economy.

Concerns raised by the Highways Agency do not appear to have been addressed.

The Places Matter document addresses the concerns about the development which echo those that I made in my original objection. Edenfield will lose its "special character" and probably could no longer be called a village should this development go ahead.

Proposed further release of Greenbelt for the school, play area and car park at the north side of the village is not aligned to RBC Local Plan and will have an adverse impact on the environment/ ecology/water drainage and also raises safety issues at the already busy junction close to the school.

The current planning application should be put on hold whilst RBC reviews whether the decision that was made to release the greenbelt sits in line with the government's vision to "not concrete over our countryside" and "regenerate existing brownfield land".

I raised in my original objection about my concerns on the impact of the wellbeing of residents of the size, nature and duration of this proposal. This not only stands, but I also
would like to add to that the impact on our wellbeing from having to keep trawling through these huge amounts of documentation.

My objections are by no means an exhaustive list, but I am in full support of any and all concerns raised by the Edenfield Community Neighbourhood Programme. I would like to take this opportunity to thank them for helping to make sense of the more technical aspects of the proposal.

Yours faithfully

Janet Smith

24 July 2023

Planning and Building Control Rossendale Borough Council Business Centre Newchurch Road Bacup <u>|</u> OL13 OBB

Letter sent by email only to: planning@rossendalebc.gov.uk

Dear Sirs

Masterplan and Planning Application No: 2022/0451 – Edenfield Consultation

The above application for some 238 houses is the largest element of the area known as H66 which overall involves a total of around 400 houses a scenario which has always been both unwelcome and unrealistic and remains so today.

The provisional granting of the erection of such a large number of houses in Edenfield utilising greenbelt land for the purpose was originally attempted to be justified by RBC adopting the phrase "our hands are tied because of government house building targets".

Since approving the proposals for H66 in December 2021 much has changed at government level with our local MP Sir Jake Berry committed to pushing back RBC's decision to allow green fields to become building sites for housing estates. Additionally the communities Secretary Michael Gove has removed these compulsory targets that RBC claim were the prime reason for sacrificing a high proportion of local greenbelt to facilitate such a large development in Edenfield.

If the current government position were to be applied then it is impossible to see how RBC could have come to the same decision now that they did in December 2021.

Given the above and also the overwhelming level of objection from the very outset by the residents of Edenfield for these developments combined with RBC's level of concern in connection with at least the Taylor Wimpey plans along with the possibility the position may be further exacerbated once detailed plans are submitted for the Peel and Anwyl sites then this is surely an opportunity for RBC to have a big rethink on H66.

As we sit today the above remains wishful thinking and accordingly we return to what currently faces us.

We start by first considering the letter from Rossendale Borough Council (RBC) dated 18th May 2023 addressed to Pegasus Group and comment as follows:-

The letter raised many issues but the significance and extent of these is probably best illustrated by the last paragraph part of which is reproduced here:-

"There are considerable concerns with the current proposal and the Masterplan and Design Codes need to be fundamentally revised to produce a comprehensive Masterplan/Design Code which encompasses the issues raised in the letter and covers the entire site allocation in full."

The extent of the concerns which were not limited to one or two issues but were wide ranging further emphasise the total inadequacy of the plans (as viewed by RBC) across many fronts.

The detailed response from Pegasus Group dated 23rd June 2023 initially poses a singular question that needs to be answered and that is does the response fully satisfy the RBC concerns in every respect and if not what concerns do they still have.

Furthermore given that all the issues in the RBC letter were viewed as "considerable and fundamental" it follows that unless the Pegasus response fully addresses the concerns at every level and more importantly includes both practical and workable solutions that can be demonstrated as such they must be seen as not having fulfilled the RBC concerns.

Such an outcome must translate into a scenario where planning permission cannot and must not be granted.

As the above looks at matters in a very much overall perspective we set out below some more specific and detailed points that are all primary reasons that support rejection of the plans.

There is one issue that is very much singularly significant that in effect calls into question the whole concept behind the development that is H66 which is the following:

A thread that runs through the H66 plans is that they are very much geared to the new residents that will be housed there significantly to the detriment of existing residents in the form of direct and indirect discrimination. Current residents are being displaced from parking their cars outside their houses on Market Street, Exchange Street and potentially elsewhere. Of those so displaced there will be a proportion that are either frail or disabled – how can this be morally fair or equitable. These are issues that cannot be ignored or set aside and indeed there is legislation in place in the form of the Equality Act 2010 under which RBC as a public body have a duty to eliminate discrimination in all its forms. Accordingly it is imperative that an impact assessment be undertaken to ensure that the principles being applied to the H66 site are also applied to existing residents.

Further general points:

- There is still no agreed comprehensive masterplan for the whole site and even though a revised version has been produced it substantially relates to the Taylor Wimpey site whereas the masterplan should be a collective document involving RBC and all four developers.
- The Peel/Northstone development proposes a further release of greenbelt not covered in the RBC adopted local plan – such a step would potentially create a precedent for further removal of greenbelt. Furthermore it will have an adverse impact on safety issues around the school at what is already a busy junction. Additionally, ecology and water drainage would represent further significant issues.
- 3. There are no phasing proposals that include time scales without which building could be simultaneous with all the attendant traffic and safety issues this would entail. Indeed the present plans seem to envisage a simultaneous scenario without any thought for the obvious chaos this would cause.
- 4. Flood risks overall are a known issue along with the specific concerns from National Highways about the A56. These cannot be ignored put perhaps what is equally significant is that it is also possible that the matters raised by National Highways are not capable of being resolved. Allied to the above is the proposed SUDS location being too near to the A56 posing a further serious road safety concern.
- 5. The infrastructure required for such a major development as this is still being substantially ignored especially in terms of schools and healthcare.
- 6. Design codes as detailed in the Neighbourhood Plan produced by ECNF and referred to positively in the Places Matter Design Review report are given very limited consideration whereas they are very much a key issue in this development.
- 7. The importance of the above is enforced when looking at the Taylor Wimpey development and observing that it is both cramped as well as being lacking in green spaces/landscaped areas thereby ignoring the recommendations in the Places Matter Design Review report.
- 8. The Market Street mitigation measures that include double yellow lines and new junctions across the North, Central and South of Edenfield pose serious traffic, cycle and pedestrian safety concerns.
- 9. There is no traffic assessment for the whole site and no road safety audit despite previous recommendations.
- 10. The mitigation measures noted above and in particular the increases in parking restrictions will have a negative effect on the local businesses and consequently the local economy. The most significant of these will be the resultant decreased footfall potentially giving rise to business closures and loss of livelihood.

Exchange Street Area and associated Safety Concerns

- The lower reaches of Exchange Street are bordered by a Play Area on one side and a Recreation Ground on the other along with a new Cycle Pump Track. The existence of the above facilities necessarily means the area is regularly used by children both on foot and riding pedal cycles not to mention other pedestrians such as dog walkers etc.
- 2. These aspects alone should be sufficient to make the case that any proposed increase in traffic here is just not realistic, safe or sensible and really would be an accident waiting to happen.
- The proposal to make the street one way with double yellow lines in some parts could make the situation even worse in that traffic would be capable of going faster. Enforcement measures and calming schemes are not likely to satisfactorily resolve matters.
- 4. The street is used for car parking by both residents and those who are working at or who are customers of the local shops where will they go?
- 5. The left turn into the street from Market Street is blind which considerably compromises safety aspects further exacerbated by double yellow lines and narrow footpaths.
- The proposed changes to Exchange Street will also considerably impact on The Drive

 Highfield Road and Eden Avenue creating significant safety issues throughout the area. These are all main access routes to the facilities for those persons noted in 1
 above further compounding the safety issues.
- 7. It appears to me that no proposals could come close to creating an environment that would produce the required degree of safety for those using the area.
- 8. In consequence I am bound to say that any proposal to utilise any of the above routes for access to either the Anwyl site or the Taylor Wimpey site is on safety grounds alone just not feasible and must be rejected at all costs.

Based on the above we are firmly of the view that planning application 2022/0451 as referenced above must be rejected. By way of further comment we confirm that we fully support the views and objections more comprehensively put forward by the Edenfield Community Neighbourhood Forum (ECNF).

Yours faithfully

David Fisher and Sandra Fisher

Ref: Objection to the Revised Planning Application Ref. No. 2022/0451 Edenfield Masterplan Address and Site: Land West of Market Street, Edenfield, Lancashire

For the urgent attention of the Planning Officers and Councillors

Dear Sir / Madam

The revised plans must be rejected in their entirety for the following reasons:

1) Unsuitability - Highways

At present, traffic approaching from Rawtenstall travelling towards Bury meets traffic from Haslingden/Helmshore/Irwell Vale at the traffic lights on Market Street near the CoE Primary School.

At the traffic lights one can take a sharp left to Rawtenstall or, pass the school and drive along Market Street to the Mini Roundabout at the other end of Market Street.

Here one can take a left exit to Rochdale or go straight on to Bury with the possibility of a right turn after approx. 100m down Bolton Road North to Stubbins and Ramsbottom.

Please Note: Traffic from 3 directions meeting at the Mini Roundabout on Market Street.

At the other end, the Junction at the Traffic Lights on Market Street near the Primary School is

- a) very busy
- b) very close to Edenfield Primary School
- c) totally 'parked up' in all directions during the School Run

A 'LolliPop' Person assists children and parents to cross safely in front of the school. It is a very busy and rather dangerous crossing. The roads are narrow and parked up at the best of times. Along come buses, lorries, cars and bicycles, carefully negotiating a path through the happy throng in between the parked cars and people dashing across the street.

When there are problems on the nearby Haslingden By-Pass or the M66, traffic is re-directed through Market Street. More traffic.

To date, Edenfield Residents and the surrounding houses are aware of the situation and practise patience and understanding during those difficult times. There have been few incidents, if any.

People living on Market Street park their cars in front of their houses.

Edenfield cannot absorb a housing development and the inevitable additional traffic, irrespective of the 'Revised Masterplan' from Taylor Wimpey.

People are happy to live in this old village with the charming landscape at the rear of their houses. Please be reminded: It is a Green Belt Area!

There are Playing fields, Bridle Paths and Footpaths down into the valley and up into the hills. A rare spot of rural living and a haven for children. It must not be destroyed, and a Green Belt Area used for a housing development which can go on Brown Field Sites.

PLEASE Stop this Development.

2) Unsuitability due to increased risk of Flooding

The impact of the planned development will have disastrous consequences regarding future flooding in Irwell Vale, Strongstry, Chatterton and as far as Stubbins and Ramsbottom. The change in our weather pattern (call it Global Warming?) with long spells of drought followed by increased rain and rain storms is a serious danger to those communities. Severe flooding occurs more and more frequently. The combination of surface water and the rivers Irwell and Ogden combine to an Irwell Vale Torrent in severe weather and constitute a considerable flood risk to the lifes and living space of the people in those villages.

The on-going efforts of the Environment Agency and their Report in *"Irwell Vale, Chatterton and Strongstry Flood Risk Management Scheme"* are commendable and appreciated, but are way off target.

The aforementioned Housing Development Plans in Edenfield will further aggravate and contribute to the flooding problems caused by additional surface water. Some of my neighbours in Irwell Vale can testify to the terrifying experience of flooding caused by additional surface water from the hills.

Please, for our and our children's future - say

NO to the planned development

Thank you.

Yours sincerely,

Elizabeth Hodgson

Ref Revised Masterplan Edenfiekd Reference no: 2022/0451 Address of site: Land West of Market

Hello

I would like to object to this plan. The plan is imbalanced. The benefits of new housing do not outweigh the impact to the community of Edenfield.

The plan basically doubles the size of Edenfield with no benefit to the local community, only further congested roads, pressure on local amenities, and loss of the green and village character of the area.

Roads in all directions from Edenfieid particularly the route through Shuttleworth are already overwelmed by traffic in the morning trying to reach the M66. This alongside other developments occurring in Shuttleworth will make things far worst.

The land to the south adjacent to the community playing fields is not currently grazed and is an insect and wild flower haven in the summer.

Further I would question the potential hazards downhill to the storm water run off once this green belt is gone.

If the plan was 1/3 to 1/2 the size I might accept it was balanced and reasonably considered. This is just a land grab for the building sector to build yet more over priced housing for an out of town commuter market. I doubt it will even provide any seriously affordable and sustainable housing.

Please reconsider this disasterous proposal for our community.

Regards

Matthew Whittaker

Good morning,

Housing Allocation H66 (Edenfield) - Revised Masterplan & Design Codes Consultation.

The application site is located nearby the Grade II* listed Edenfield Parish Church, and is also adjacent to three non-designated heritage assets. This includes Chatterton Hey House (Heaton House), Mushroom House and the Old Vicarage. NDHAs are identified as being buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

The amendments to the scheme include a communal parking area at the entrance from Market Street to a section of Taylor Wimpey's allocation. The parking area will be located to the north east of Mushroom House. The pedestrian/cycle route has been moved further east and will now go through the development rather than being located along the western edge of the proposed development block. The revised Masterplan shows the route running alongside the former Vicarage and onto Church Lane. The Masterplan also shows the incorporation of the land to the east of Market Street, owned by Peel, which is proposed to be a community car park as well as a potential school expansion into the Green Belt immediately to the rear of the Primary School.

The revised Masterplan shows that the tree cover will be retained around the Grade II* listed Edenfield Parish Church and Chatterton Hey, as well as the mature garden at Mushroom House. Tree cover will also be retained to the south of the former Vicarage, creating separation between the non-designated heritage asset and the proposed development.

The amended plans will cause no harm to the Grade II* listed Edenfield Parish Church as there have been no alterations to the proposals within its setting. Additionally, there have been no alterations to the proposed plans surrounding Chatterton Hey and the existing wooded area is to be retained, meaning that there will be no further impact on its setting. The communal parking area to the north east of Mushroom House will likely have a no notable impact on the setting of the NDHA, as noted above the mature garden at Mushroom House is to be retained and dwellings will be erected between the parking area and the NDHA, as such views of the parking area from the setting of Mushroom House will be limited.

The Masterplans shows that a pedestrian/cycle route will be introduced alongside the former Vicarage, linking to Church Lane. Whilst the route appears to run close to the boundary of the NDHA, I feel that any harm caused by the path will have an overall limited impact on its setting and it will link up with an already established public right of way. Overall, I feel that the proposed route will cause no/a negligible level on harm to the setting of the former Vicarage.

As noted above, the Masterplan also shows the incorporation of the land to the east of Market Street, which is proposed to be a community car park as well as a potential school expansion into the Green Belt immediately to the rear of the Primary School. This proposal will have no impact on the setting of Mushroom House, the former Vicarage, or Chatterton Hey due to the distance between the NDHAs and the site. The application site sits a short distance from Edenfield Parish Church, however, any visual impact on its setting will be limited due to the sightline being obscured by existing dwellings and the Church being set back from the road, meaning that any shared views will be limited.

Overall, I feel that the amended plans will have a limited impact on the setting of the NDHAs as discussed above, and no impact on the Grade II* listed Church. The previous comments (submitted 24/01/23) can be referred to in regard to the general impact of the overall scheme. Again, I feel that

the proposed scheme will likely cause only negligible levels of harm to the heritage assets discussed above. Whilst the new housing and associated works will likely be seen in the setting of each of the heritage assets, this is largely mitigated by screening from existing or proposed trees and the distance/space between the assets and the proposed dwellings. As such the proposal meets the objectives of Chapter 16 of the NPPF and accords with the policies of the Local Plan.

Kind regards, Olivia Birks Heritage and Conservation Advisor Growth Lancashire A:

M: E: W: <u>www.growthlancashire.co.uk</u>

Growth Lancashire Limited is a Company incorporated under the Companies Acts (reg. no. 05310616). Registered office : Lancashire County Council, County Hall, Fishergate, Preston PR1 8XJ.

30th July 2023

Objection to Edenfield Masterplan and Taylor Wimpy Planning Application 2022/0451 Edenfield

- There continues to be no comprehensive Masterplan for the area as a whole.
- The Masterplan clearly does not include the whole site as all developers are not represented
- Concerns over the phasing/how the development will be built have not been adequately addressed
- There is no comprehensive traffic assessment for the whole of Edenfield within the Masterplan by definition, it should involve all developers and include an overall Transport Assessment alongside the planning application.
- The Design Code produced by ECNF with support of RBC has still not been fully considered
- The Taylor Wimpy proposal still fails to address the recommendations in the Places Matter Design Review report.
- Concerns on ecology, drainage and flood risk are not addressed. Where is the water, currently slowed by the fields going to go? The A56 is already prone to a lot of surface water, draining down from Edenfield via the current fields to slow the rate, what will the impact of this Masterplan be? The A56 is a main access point, not only for Edenfield, but for Rossendale. Putting a few cycle paths doesn't seem to balance the carbon footprint of building a further 400+ houses. Have the residents of Irwell Vale been advised of any increased flood risk?
- The proposal still fails to address the lack of infrastructure including schools, doctors but also other local amenities which if not addressed will increase the number of car journeys thus impacting not least on the local environment but also the air quality, particularly around the school.
- Sufficient school parking, the proposal for further release of Greenbelt land for a school car park is unwarranted. Provision should be made with the TW development for parking and TW should ensure there are safe paths throughout the development to enable children to walk safely to school.
- Concerns regarding the environmental impact are not adequately addressed. Given the children clearly cannot be accommodated at Edenfield school, where is the assessment of the environment impact of all the car journeys for transporting the children twice a day, each school day? Where is the environmental information re the increase in pollution,

not only by a further 800 vehicles, but also the standing traffic that will result in delays?

- The suggested solution re mitigation measures for Market Street and the proposed new junctions, fail to address the traffic, pedestrian and increased cyclists adequately. There appears to be no comprehensive traffic assessment or road safety audit. These need to be provided to enable all residents to fully consider the risks that have been considered and in particular whether any proposals are adequate in addressing these risks.
- The current proposal appears to focus on the development of the village and fails to give any consideration to current existing residents. The suggestion that current residents would be unable to park outside their own homes is potentially discimination. Rossendale Council, as a public body, are reminded of their duties under the Equality Act 2010. An Equality Impact Assessment needs to be completed and shared to ensure there is no direct or indirect discimination to exisiting residents.

We would ask Rossendale Borough Council to reject the Masterplan/Design Code and also the Taylor Wimpy planning application number 2022/0451 and should be rejected.

Yours faithfully

Claire Jewell & Graham Jewell

To whom it may concern,

I am writing to object Edenfield Masterplan and Taylor Wimpey's Planning Application 2022/0451. As a resident of Edenfield I have many concerns around the proposed plans.

Firstly, there continues to be no agreed comprehensive masterplan for the whole site, the revised version only representing the voice of Taylor Wimpey. I believe the masterplan should be led and developed by Rossendale Borough Council (RBC) or all four developers together as required by the RBC Local Plan in order to represent the voice of the residents of Edenfield.

Secondly I anticipate serious traffic, cycle and pedestrian safety concerns, particularly the Market street mitigation measures and site of new proposed junctions across the North, Central and South of Edenfield. There is only one crossing point proposed at the North side of the junction and this is not wide enough to incorporate cyclists. This will undoubtedly cause safety concerns for primary school children who will use this route in crossing Market Street from the South Side. The plans proposed do not ensure that pavements are the advised 2metres wide. This causes safety concerns for pedestrians and in particular people with small children, the elderly and those who require disability aids. It is my understanding that despite these safety concerns being highlighted on numerous occasions in the planning stages, there has been no safety audit. It is my opinion that the traffic proposal would NOT pass a road safety audit. I therefore request that a road safety audit is conducted ahead of these plans moving forward.

Further to this, phasing of building works has not be addressed, in fact simultaneous building by all developers is mentioned which would be chaotic and lead to serious safety concerns for the road system and pedestrian/cycle safety. I currently live on Dearden Fold located off of Rochdale Road Edenfield. In recent months 9 new build houses have been under construction along Rochdale Road. This construction site, extremely small by comparison to the proposed Edenfield Master Plan, has caused significant traffic disruption. This has impacted greatly on my commutes to work and accessibility to the centre of the village. It has further caused safety issues for pedestrians crossing Rochdale Road. Based off of the level of disruption experienced as a result of this small construction, I anticipate chaos on a grand scale should building works for the masterplan and Taylor Wimpey's Planning application be passed.

I would also like to raise the concern that the infrastructure required for such a development is still being ignored, particularly issues of schools and healthcare. Edenfield is a village, and the proposed extension to the small local school will not be sufficient to accommodate the influx of young families moving to the area. At present there is no doctor's surgery in Edenfield and it is my experience that GP surgeries in surrounding areas are already difficult to access due to high demand. This is not to mention dentists, nurseries and more. It is vital that essential services such as these are accessible to all. Proposed plans do not provide these basic services sufficiently.

Furthermore, serious concerns over the equality impact of the development still remain. All of the measures proposed are geared towards the development of the H66 site to the detriment of existing residents, resulting in direct and indirect discrimination. Current residents are being displaced from parking outside their houses on Market Street, Exchange Street and potentially elsewhere, some of whom are known to be frail and disabled. As a public body, Rossendale Borough Council have a duty under the Equality Act 2010 to eliminate discrimination. I therefore request that an equality impact

assessment is undertaken to ensure that the principles being applied to the H66 site are also applied to existing residents.

In addition to this, the compensatory car park is not large enough or fit for purpose. A recent audit identified between 35 and 40 cars parked every night. The proposed car park appears open to new and existing residents therefore can't be compensatory. This car park will be further from homes than present street parking, at detriment to current residents. Furthermore, there are no proposed spaces for potential trades/service personnel and no future proofing.

Parking restrictions will undoubtedly have a negative effect on local businesses and consequently the local economy. It will result in decreased footfall and subsequently potential closure of businesses. This will impact on the livelihood of existing residents.

The issues of ecology, rainwater pollution and flood risk continue to be ignored, and the SUDS (sustainable drainage systems) located close to the A56 pose a serious road safety concern. The flood concerns on A56 are still awaiting national highways feedback. I anticipate this feedback to highlight the risk of this issue.

Finally I wish to highlight issues associated with the proposed further release of Greenbelt. This is on the pretence of being for the school, a play area and a car park at the north side of the village, however, Taylor Wimpey's Planning Application has NO green spaces within the proposed housing development as recommended in the Places Matter Design Review Report. The development is poorly designed with a cramped layout. The proposed green space is being placed on the western periphery. This is a cost saving tactic, not considering the best interests of the village and its residents. This is not aligned to Rossendale Borough Council Local Plan and will have an adverse impact on the environment, ecology, water drainage, which also raises safety issues at the already busy junction close to the school.

Overall, it is clear that the proposed plans are not in the interest of the residents of Edenfield and pose significant safety, environmental, social and economical issues. Practical solutions have not been offered despite clear issues being raised previously on numerous occasions throughout the planning process.

I request the highlighted concerns be taken into consideration and look forward to your response, addressing these issues raised.

For the above reasons, I strongly object to the proposed plans.

Yours Sincerely,

Lesley, Ian and Joanna Quigley

To Whom it may concern.

As a resident I would like to strongly object to the above plan due to the following reasons:

- Destruction of farm land, natural habitats and the further release of greenbelt. Our environment should be protected for the future. All brownfield sites and empty homes should be used first.
- Greenbelt compensation proposals are unclear and need clarification.
- New junctions unsafe and not fit for purpose.
- Traffic safety for cycling and walker that could result in injuries or fatalities. The roads are already unsafe and the introduction of an additional 900 car to the village at peak periods will result in a even more dangerous situations.
- Double yellow lines and restrictions on parking will have a negative effect on local business's. It will also be unsafe for residents when unloading their children and accessing there homes.

Kind regards

Jamie Irwin

John Entwistle

1 August 2023

Subject: Objection to Planning Application 2022/0451 - Proposed Developments in Edenfield

To Whom It May Concern,

I am writing to formally object to the planning application and building development proposals in Edenfield, specifically focusing on the three sites identified in the masterplan and planning application 2022/0451. As a concerned resident, I urge you to carefully consider the following objections and concerns:

Proposed Peel/Northstone Development:

The proposed release of greenbelt land to accommodate a car park, play area, and school extension sets a dangerous precedent for future development within Edenfield. The preservation of greenbelt areas is vital for the environmental and aesthetic well-being of the village.

The addition of two new junctions, making a total of eight in a small area, raises significant safety concerns for pedestrians, cyclists, and overall traffic flow. Limited visibility and the proximity of these junctions to 30 mph zones pose potential risks to the safety of the community, particularly school children.

The proposed gateway location lacks effectiveness in enhancing road and pedestrian safety, as evidenced by the recent closure of A56, diverting traffic away from the village and ignoring existing traffic calming measures.

The installation of double yellow lines in front of houses raises practical difficulties for residents in accessing their properties with shopping, young children, and babies.

The uncontrolled crossing at the school is not wide enough to ensure pedestrian safety, especially for young children, and raises serious child safety concerns.

The absence of crossings on Blackburn Road and Burnley Road poses significant safety concerns for existing and future residents, particularly vulnerable groups such as children and people with disabilities.

The cycle path from the core of the village does not connect to the cycle path north of the village, rendering it unsuitable for its intended purpose.

Proposed Taylor Wimpey Development:

The proposed site access for the Taylor Wimpey development on Market Street poses serious safety concerns. The heavily trafficked area, often used as a diversion route, raises risks for residents, cyclists, and school children.

Insufficient safety measures, such as visibility and traffic management, have been proposed for the private access road opposite the development, potentially endangering residents and vulnerable road users.

The inadequately sized compensatory car park, lacking facilities such as electric charging points and disabled provision, raises concerns for parking availability and future proofing.

The absence of a phasing proposal for the Taylor Wimpey site may lead to prolonged construction activity, impacting road and pedestrian safety.

The proposed location of Sustainable Urban Drainage Systems (SUDS) near the A56 poses flood safety risks and may jeopardize road users' safety.

Incorrectly mapped areas may affect the accuracy of traffic proposals, leading to further concerns about road and pedestrian safety.

Proposed Anwyl Development:

The proposed one-way system on Exchange Street may not effectively address safety concerns, and the blind left turn from Market Street to Exchange Street raises significant safety issues for traffic, pedestrians, and cyclists.

The proposed access via The Drive, Highfield Road, and Eden Avenue lacks adequate visibility due to double parking and children playing in the area, potentially endangering pedestrians and cyclists.

Double yellow lines and restricted parking on Market Street and Exchange Street may negatively impact local businesses, affecting footfall and the local economy.

The absence of clarity on the proposed additional parking's purpose and enforcement may lead to complications and insufficiency in compensatory parking.

The concerns mentioned above are overarching and affect the entire village of Edenfield:

The lack of a comprehensive masterplan that incorporates input from all developers hinders proper development coordination and community well-being.

Proposed further release of greenbelt land contradicts the need to preserve green spaces for environmental health and aesthetic reasons.

Inadequate and unsafe new junctions pose serious traffic, cycle, and pedestrian safety concerns that could lead to accidents and fatalities.

The absence of a road safety audit, despite being raised as a concern multiple times, calls into question the thoroughness and safety of the proposed traffic measures.

Implementation of double yellow lines and parking restrictions may negatively impact local businesses and, in turn, the local economy.

The lack of a phasing proposal raises concerns about road and pedestrian safety during the construction process.

The proposed developments may inadvertently discriminate against existing residents to accommodate the needs of new residents.

There are significant flood safety risks, particularly on the A56, which need to be addressed to ensure public safety.

In light of these numerous objections and concerns, I urge the local council to reconsider the planning application and building development proposals for the small village of Edenfield. I strongly recommend a comprehensive reassessment of the masterplan to ensure the safety, well-being, and sustainability of the community.

I request the council to conduct a thorough road safety audit, address flooding concerns, and carefully consider the impact on existing residents, local businesses, and the economy before granting approval for any further development.

I trust that you will give careful consideration to these objections and concerns in the interest of preserving the unique character and safety of the village of Edenfield. I look forward to a timely response regarding the action taken in light of these objections.

Thank you for your attention to this matter.

Yours sincerely,

John Entwistle

Location: Land West of Market St, Edenfield Proposal: Full application for the erection of 238 no. residential dwellings and all associated works, including new access, landscaping and public open space.

I am writing this letter to vehemently express my objection to the revised plans and documentation in respect of the above proposed development (Edenfield Masterplan and planning application 2022/0451). As a concerned resident of Edenfield, I firmly believe that this development plan poses serious safety concerns and fails to adequately address the well being and needs of existing residents. I urge you to carefully consider the points outlined below, as they have significant implications for the safety, accessibility and quality of life in our community.

- 1. Safety Concerns Regarding the New Junction Entrance on Market St. The proposed site access on Market St as a new junction entrances raises serious safety concerns. Market St is already a highly trafficked road and serves as a National Highways Diversion route when the A56/M66 experiences closures. The safety measures proposed do not appear to be sufficient and may not meet the requirements for a development of the proposed scale. Insufficient visibility and the potential risk to the lives of residents, cyclists and primary school children (located just 250m from the junction) are of grave concern. The necessity of a road safety audit has been mentioned, yet it has been disregarded. By neglecting to address these safety concerns, Lancashire County Council and RBC may potentially breach their responsibility to ensure the safe day to day life of all residents in Edenfield.
- 2. Double Yellow Lines and Accessibility for Current Residents. The introduction of double yellow lines in front of our houses raises concerns about us, current residents will access our properties with shopping and young children. The proposed compensatory car park is neither sufficiently large nor fit for purpose. A recent audit has identified between 35-40 cars parked every night, suggesting that the car park is open to new and existing residents, rendering it non-compensatory. Moreover, the lack of spaces for visitors, tradespeople and services, as well as the absence of electric charging points, further exacerbates the issue. Restrictions on parking will also negatively impact local businesses. This plan demonstrates discrimination against existing residents to accommodate the needs of residents in new houses.
- 3. Lack of Comprehensive Masterplan and Phasing Proposal. A significant concern is the absence of a comprehensive masterplan that incorporates the input of all developers or a clear phasing proposal for the TW site. The lack of these essential elements suggests that the are could potentially be one big building site for the next 10 years, causing traffic congestions, pedestrian safety hazards, and a decline in the overall quality of life for residents. It is imperative that a comprehensive Masterplan and phasing proposal be established to minimise disruptions and ensure the safety and well being of all residents throughout the development process.
- 4. Inadequate Crossing Points. The proposed plan includes only one crossing point on the north side of the junction, which raises serious safety concerns for the very young primary school children (including my own) crossing Market St from the south side. This lack of adequate crossing points poses a significant risk to their safety.

5. Overall Flood Risk. There appears to be an overall flood risk, particularly on the A56, leading to severe traffic and safety concerns. These risks should be thoroughly evaluated and addressed before any approval can be considered.

I kindly request your acknowledgement of this objection.

Thank you for your attention to these critical concerns. I trust that you will give due consideration to the objections raised and act in the best interests of our community and make decisions that prioritise the safety and well being of all residents of Edenfield.

Yours sincerely Amy Preston Please can we object to the Edenfield Master Plan ,we are concerned about the following: Traffic ,congestion, parking and risk to drivers and pedestrians Insufficient infrastructure in Edenfield and surrounding areas The excessive amount of proposed building work along with other schemes currently in progress, proposed and future eg Peel Holdings The loss of green areas, risk of flooding and loss of wildlife habitats. Please carefully consider our comments and objections. Regards Keith and Shirley Butterworth

Sent from Mail for Windows

bentleyal < > To:forwardplanning@rossendalebc.gov.uk 3/8/2023

RE: Masterplan and planning application 2022/0451

Dear Sirs,

We strongly object to the revised Edenfield Masterplan Design Code submitted by Taylor Wimpey alongside their planning application 2022/0451 relating to building of houses in Edenfield, Lancashire.

We wholeheartedly agree with all the valid concerns/objections made by **The Edenfield Community Neighbourhood Forum** and other concerned residents, relating to

- 1.NORTH : Church and School end of village_proposed Peel/Northstone Development
- 2.CENTRAL: Market St corridor Proposed Taylor Wimpey development
- 3.SOUTH : Village centre to South edges of village -Proposed AMWYL development

We would also refer you to our letter of planning objections sent to you on 17th Jan 2023 and stand by those existing points of objections as it would appear that this amended application is indeed worse than previous with many things slipped in, presumably hoping that because they are so very vague that the residents would not notice.

This proposal to build 238 new houses on land off Market St should be rejected by Rossendale Borough Council due to the following:

There is still no detailed Master Plan for the whole of the H66 site. **No such Master plan has been submitted.**

The revised version only represents Taylor Wimpey.

It does not comply with Local Development Plan.

It does not consider the design code produced by Edenfield Community Neighbourhood Forum.

<u>The scale, density and character</u> is not in keeping with the existing style of the village. An additional 238 houses (*plus the others of Peel AMWYL and now Alderwood*) will have a **huge negative impact for existing residents,** in terms of disruption to how people go about their ordinary lives, devaluing houses or making them unsalable for several years, particularly in the construction years and then forever after.

The construction phase of ten years the noise, construction traffic chaos, dust, pollution and increased CO2 emissions, the physical and mental effects on existing residents has not been addressed and that is aside from the **major concern of access to the site** (see later)

There is no mention of how phasing of building works would be done, how the disruption would be sorted, nor of the infrastructure that would be required to basically serve this new TOWN... well, it certainly wouldn't be our village any more!

The scale is hugely disproportionate in relation to the existing number of dwellings in Edenfield and is far in excess of the Borough's targets.

Housing density isTW's primary concern in their application. More houses means more profit for them. However, that should not be a driving force for development. The roads within the

development are too narrow, the driveways not big enough for the number of cars that may be at each house, and the size of the garages shown are not big enough to get most family saloons in let alone the more rural suitable vehicles that are common around here. People are being encouraged to enjoy the psychological and physical health benefits of green spaces, plant up their gardens, plant trees etc, yet the gardens of these new houses are minimal... not what you would expect in a rural location.

Plus not enough green/landscaped communal areas.. yet again ignoring the Design Review done by Places Matter.

The Plan talks about Edenfield CORE, but that does not appear to relate to what is presently the centre!

Where is the mixed tenure approach for new local businesses?

Shops would be non-existent within a short space of time not increased, if the parking restrictions shown on the plan are instigated...i.e. if there is no parking people will go to shop elsewhere. Restricted parking i.e.8am to 6pm is laughable... that's exactly when the shops would be open! This would ruin several people's livelihoods.

Doctors, dentists and other health services are presently inadequate, particularly for those that do not drive such as the elderly. However, With **no parking** throughout Market St, how will **community** nurses, care workers, podiatrists, doctors etc be able to visit their patients?

Bus services or lack of - also apparent. Bus stop to be moved... where to? No detail!

Schools ; Edenfield and Stubbins Primary schools are at capacity. The Master Plan states that there needs to be provision for schools but does not address what this provision should be. Not satisfactory!

Outdoor areas play areas for children are dated and limited already but are there any new ones? A provision of 4 benches ! The green space is on the western edge of development, way away from the existing heart of the village.

There is no joined up thinking regard linking **pedestrian pathways**/cycleways/bridleways together i.e. routes that people can use for exercise or to go from one end of the village to the other without going out onto the main road... this would be much safer and pleasanter for everyone. (kids going to school in particular, but also the disabled) The Plan shows a Mown grass path at the bottom of the estate... how long before that is an overgrown muddy mess? How does a Wheelchair navigate down a grass path?? And what about horse riders (yes -they do exist here! We are a rural location !)

Ecology and environmental impact is not addressed. The application clearly shows a net loss of green space and habitats. Protected species, namely orchids and probably others are present in these fields, They were flowering in June. I saw them myself in multiple places.

I note there has been a substation slipped in.

Energy Efficiency. – or lack of it. There are no details or provisions I can see for these houses to be built to 21st century energy efficient standards. I.e. Triple glazing, solar panels, insulation standards, waste water and heat recovery systems, heat pumps, Electric charging points etc etc. Surely a major planning consideration now.

Flooding The H66 land west of Market Street absorbs significant amounts of rainfall, with climate change increasing the risks. Covering such a large area in concrete & tarmac will have a huge detrimental effect. The A56 Edenfield, homes, businesses and farm land to the lower slopes beyond Edenfield, and beyond to Irwell Vale, Strongstry, Chatterton and Ramsbottom will all be put at extreme risk of flooding. These areas are already recognised as Flood Risk Zones, therefore any development in Edenfield will make the problems far worse.

The application shows the proposal of a SUDS in the south west of the site, in very close proximity to the A56 Edenfield bypass. The siting of such a facility so close to the A56 is unsafe. There is already an identified failure of that embankment. What happens when those repairs are needed and all the bypass traffic has to be diverted through the village!

There is also a health and Safety 'drowning danger for children' to be addressed.

In my previous objection I mentioned a **spring to the central western part,** that comes down under the village. There is nothing in the plan to investigate it and its effect on water flow.

Plus there is no detail with regard to the sewers. That could affect everyone.

Traffic No workable solution has been provided to the question of traffic in the village or neighbouring areas that would arise from the development.

The traffic situation is totally underestimated for both present and future traffic flow through Edenfield nor is the impact on the wider local road network considered.

We already have traffic jams on a regular basis where roads become gridlocked, closures of the bypass sends diverted traffic thru the village often at great speed and in the night. Market Street and Bury Road, Bolton Road West nor Rochdale Road, a HUB of 4 roads are clearly not capable of taking the level of traffic that the proposed plans would generate.

Plus the extra traffic coming through the village due to the new housing developments being done now between Edenfield and Shuttleworth.

Parking The main road of this village and others like Exchange St are mainly lined with Victorian terraced houses mostly with no front gardens or driveways, nor any rear entrances or garages. Most of the houses have at least 2 people needing cars for work etc, some can have up to 4. Where will they go?

The plans have nowhere near enough spaces to provide parking for those on Market St who will lose their on Street parking in the vicinity of the new junction (ghosted right turn).

The average number of cars parked **overnight** on Market St just from **Alderwood to the new Pilgrims Garden is** <u>39.</u>

TW's application includes **13 car parking places on** the new road into their site.(For use of new houses as well and no electric charging points!)...That is to put it mildly, laughable

A proper back lane/parking area behind those terraced houses is required at the very least.

The amount of double yellow lines shown would make this village totally unvisitable... how would people be able to unload their shopping, have deliveries, have family visits, community healthcare workers???

Crossing places are not sufficient

Access to the site

We can still see no satisfactory solution with regard to the access points to and from the proposed sites.

Site access and exits, both *during construction and afterwards* is most certainly untenable. There are very serious traffic, pedestrian and cyclist road safety concerns. There is no suitable route for normal traffic into that site, let alone for the heavy duty construction traffic that will require access.

The new plan for new junctions, double yellow lines everywhere, parking restrictions, gateway features, central hatching, coloured aggregate, etc etc do not solve the problems that will be caused.

Gateways shown on plans –coloured tarmac to delineate a particular area would have little effect on the amount of traffic going through the village or its speed. Therefore of little value to safety.

The Entry/Exit junction on Market St 'a ghosted junction' has serious safety concerns for a number of reasons. Access is directly opposite a private lane with vehicles coming in and out regularly, plus is the main pick up point for the refuse collection wagons who pick up for 20 houses. His stopping there would block the road and cause hold ups.

It would be dangerous for pedestrians crossing particularly children going to and from Edenfield Primary School. There are line of sight issues, pavement not wide enough. TW's new little car park is one way so anyone turning into the Entry road would be turning right into the parking and would have to wait until traffic waiting to exit onto Market St had gone. This would cause a back up of traffic to the junction and possibly along Market St.

I now come onto the area of most personal concern to ourselves – **the South part of the plan** i.e. Junction of Rochdale Rd, Market St, and Bury Rd (which residents consider the Centre of the Village!) and Exchange St, The Drive, Highfield Rd, Eden Ave and Bolton Rd North.

There are serious safety concerns for traffic, pedestrians, cyclists, horse riders, children, at all these road junctions and of making Exchange St a one way system. This is certainly not to help the existing residents. Do you not have a Public sector equality duty under the Equality Act 2010 ?...

Turning into exchange St from Market St is difficult anyway because it's a blind left turn and near a zebra crossing coming straight off a very fast flowing mini roundabout.

Double yellow lines... again where are residents or village visitors to park?? On Saturday morning there were 17 cars parked on right side of street and 6 on top left. Where can they possibly go?? The proposed additional parking at the ANWYL site is obviously not meant for those residents and provides no details as to its size or what it is for.

A one way system with yellow lines will encourage speeding which is a safety concern as it goes right past the children's play area and the recreation field. The traffic calming feature mentioned I doubt will have much effect.

At the bottom of Exchange St, there is a controlled emergency access with no details as to how this would work. How long before this became another free entrance to go through the new estate?

There should be no access to these areas from Exchange St, Eden Ave, or The Drive and along through Highfield Rd. These are built up residential areas not fit for the purpose of through flow of traffic of this magnitude. The area is already a 20mph area, and is sometimes a rat run when the A56 is shut to avoid the junction at the top of Bolton Rd North.

Many of the houses on these roads have a minimum of 2 cars each, and whilst many park on their drives there are still numerous cars all along the road and there is nowhere else you could provide parking along there if you put yellow lines.

In conclusion, This application quite clearly does not comply with many of the 11 conditions described in the Local Development Plan Housing Policy H66 in the Rossendale Local Plan 2019-2036 adopted on 15 December 2021 and as such the development should not be supported.

Edenfield is not the place for a large urban style development such as this and as such the application should be rejected.

The proposals are contrary to paragraph 130 of the National Planning Policy Framework in most respects.

Paragraph 134 of the National Planning Policy emphasises that 'development that is not well designed should be refused'.

In particular, proposed building types/styles employing inappropriate materials which are unattractive and unsympathetic to the local character of the village should not be allowed. TW proposals appear to be have been 'cut and pasted' from previous **urban** developments. We are not Urban. Any building that is to be done here should use a majority of stone type houses and styles, such as types done all over West Yorkshire and with different style/sizes of houses with decent gardens.

In my opinion I see this development not only as over development of the area, but, in order to accommodate new houses and their residents, and further the finances of a major developer, it is a massive discrimination to the residents already living here. I agree with the Forum that we are being subjected to direct and indirect discrimination and Rossendale Borough Council should not be allowing this to proceed.

It is not supported by our MPJake Berry either.

Alison Bentley

Keith Openshaw

Both of:

The RBC revised masterplan has failed to address a number of issues.

The flood risk is not fully addressed we already have major issues, there is no clear plan how these will be addressed for all of the developments proposed.

The issue of schooling including school places is not fully addressed.

There are no local health centres and the ones in Rawtenstall are already very busy with waits for appointments. There is no mention of improving health services for the local area that would be able to cope with a massive influx of new patients.

The idea of losing more greenbelt land, is a major issue as too much greenbelt land has already been lost to the housing developers.

Traffic and pollution is a major factor in my objection, the proposed route down Highfield rd, exchange street. Would be

The pollution from the extra traffic has not been fully explored, these levels have been estimated using the levels measured now but the levels need to be checked at peak times and with the extra lorries and vehicles to the site during the development.

The pollution levels near the TW site when cars are entering/ leaving the site would align to times that children would be walking to school, these levels can only be estimated now but would surely need addressing in the masterplan.

The village is already bursting with traffic and used as a diversion when the bypass is closed, for us trying to get to work with the excessive extra traffic. We are trying to use cars less but there is little incentive to use bikes as a form of transport with so much traffic on local routes.

regards

Anna Webster

For the attention of:

Forward Planning, Rossendale Borough Council, Futures Park, Bacup, Rossendale OL12 0BB

Ref: Objection to the revised Planning Application, Ref no. 2022/0451, Edenfield Masterplan Address and site: Land west of Market St., Edenfield, Lancashire

Dear Sir/ Madam

I wish to lodge my objections to the proposed revised plans for the following reasons:

1. Lack of comprehensive overall Masterplan.

I am concerned that the revised Masterplan appears to have been prepared by only one of the interested parties (Taylor Wimpey) rather than by all the proposed developers.

My concern is that development will be piecemeal and lack coherence without a considered overall strategy re design, green space, landscape and particularly re a planned, phased construction strategy.

The lack of this will cause unacceptable and prolonged disruption, distress and inconvenience to existing residents, local businesses and road users.

2. Surface water run off mitigation

As a resident of the flooding vulnerable village of Irwell Vale, I am very concerned to learn that the proposed SUDS (Sustainable Urban Drainage System) strategy has been found to be an unsuitable strategy in relation to the topography and ground conditions in the area.

Surface water run off has caused many more flooding incidents in Irwell Vale over the years than high river levels. The risk of exacerbating the amount of surface water flowing down the hills to our valley location is obviously of extreme concern to all residents in Irwell Vale, therefore I seek your assurance that planning permission will not be granted without the guarantee that a robust and fit for purpose SUDS strategy is in place to mitigate this risk.

3. Traffic congestion

There is no agreed comprehensive traffic masterplan for the entire site, and no traffic assessment or road safety audit.

As a car user who regularly uses the roads up to and through Edenfield, I am very concerned about the serious impact of many extra vehicles on cyclist, pedestrian, animal and vehicle safety.

Although the report from Eddison notes traffic levels have reduced compared to pre pandemic levels, it does not consider the probable sizeable increase in traffic as working from home ceases to be the norm post pandemic.

The congestion along Market St. is currently very heavy not only am and pm, but also at school leaving times.

Add to that a further 600 or so vehicles (a conservative estimate) that will arrive with the new developments, travel through the village will become even more difficult.

The traffic controls proposed are actually danger points, especially for children, cyclists and horse riders.

On the several occasions when accidents or roadworks on the A56 Edenfield bypass, traffic is diverted through Edenfield, causing huge backlogs and creating particular danger points outside the primary school and at the mini roundabout at the other end of Market St., and misery for all current residents.

4. Parking limitations and proposals

These proposals are all geared to the advantage of the development sites and are to the detriment of the existing residents, businesses and volunteers who maintain areas of the village for the benefit of all.

The ability to park near homes, businesses and worksites is of crucial importance, particularly to older residents, local customers and those needing to carry heavy equipment.

I believe these proposals are discriminatory. Existing residents, local businesses and others who regularly need to park on Market St., Exchange St and other local streets should not take second place to newcomers.

Has an Equality Impact Assessment been undertaken?

5. Character and Greenbelt

Edenfield is a small community of only 2053 (2011 Census). The proposed development will significantly increase the population of the village by potentially 50%

This substantial increase in population will have a dramatic impact on both the character of the village and on the existing infrastructure.

I am concerned that there is a lack of green or landscaped spaces within the TW site, ignoring the recommendations in the Places Matter Design Report.

I also note that, having already removed the green fields from the west side of Edenfield, including the field of wild orchids adjacent to the Recreation ground, it is now proposed to remove the only remaining roadside area of green belt in order to form a car park.

The character of Edenfield village will be changed irrevocably if these schemes are implemented as they are.

Please confirm how the proposed developments will mitigate the impact, through design, scale and impact of the development, on the existing village character.

Alexander Stewart

31st July 2023

Dear Sirs,

I am writing to register my objection to the above referenced planning application.

Edenfield Masterplan / Taylor Wimpey Planning application 2022/0451

As a resident of Edenfield living on Market Street for the last 30 years I am writing to express my objections to the proposed development to the west of Market Street designated H66 under the planning application referenced above.

Firstly I want to comment on my absolute objection to the whole concept this proposed development in the Edenfield area.

The sheer scale of the proposal beggers belief. As everyone involved knows there are just under 1000 residences in the village at the moment. The intention is to build a further 450 houses on what is or was GREEN BELT LAND. Who are the elected official who voted this scheme through the Council meetings. No Council member who actual lives in the village that's for sure. The Council's action will ruin the lives of the people who live in this village for ever more. Councillors are elected to safeguard the lives of the people who live the Borough of Rossendale. The current elected Councillors have voted to blight the lives of all the residents of Edenfield.

It would be helpful for Councillors to read and seriously consider the article printed on page 8 of the ROSSENDALE FREE PRESS dated July 21st 2023. The article is headed **"Council finally has chance to do right by residents"**

My objections to the proposed development are as follows.

- Serious safety concerns one way system Exchange Street won't resolve safety concerns; left hand turn from Market Street to Exchange Street is a blind left turn which is a major safety concern for traffic, pedestrians and cyclists
- Serious safety concerns junction Highfield Road/Exchange Street particularly child, pedestrian and cycle safety as directly opposite new Cycle Pump Track which is not detailed in either masterplan or planning application
- Serious safety concerns re the proposed access to the site via The Drive, Highfield Road, Eden Avenue – visibility is severely affected by double parking and children play on these streets, hence particular concern for pedestrian and cycle safety; pavements and roads are not wide enough for the amount of traffic they will serve
- Double yellow lines proposed on Market Street and Exchange Street and restricted parking 8am until 6pm – likely to result in reduced footfall to local business butchers, bakers, pharmacy etc. which are essential services and important for the local economy – businesses are like to close if insufficient footfall resulting in a negative effect on the local economy – opposite of what was proposed in local plan
- Gateway proposed

 location seems dangerous, misrepresents the start/exit of the village, is unlikely to have an effect on road/pedestrian safety due to size of development/increase in traffic, A56 being closed recently has highlighted this, and traffic diverted ignoring traffic calming measures and they have not been enforced
- No indication of who the proposed additional parking on the Anwyl site will service – is it compensatory parking for existing residents? Is it for new residents? Can it be enforced? No suggestion of future proofing e.g. electric charging points. If compensatory parking unlikely to be sufficient

- Double yellow lines in front of houses how will current residents access properties with shopping, babies and children etc.
- Proposed further release of greenbelt
- Proposed new junctions unsafe and not fit for purpose
- Serious traffic, cycle and pedestrian safety concerns could result in fatality
- No road safety audit, despite this being raised as a concern on several occasions- we do not believe the traffic proposal would pass a road safety audit
- Double yellow lines and restrictions on parking will have a negative effect on local business's, resulting in a negative effect on the economy the opposite of what was promised in local plan
- No phasing proposal concerns over road and pedestrian safety if phasing is ignored and building undertaken simultaneously
- Discrimination against existing residents to accommodate needs of residents in the new houses
- Flood risk overall but particularly on the A56 leading to serious traffic and public safety concerns still awaiting national highways feedback.
- •
- Serious safety concerns re new junction entrance /exit to Taylor Wimpey (TW) proposed 238 houses site access proposed on market street is highly trafficked, heavily parked upon National Highways Diversion route if the A56/M66 shuts, a key route for agricultural and large quarry vehicles in the area and for cyclists that both commute (Bury, Rawtenstall & further afield) and recreational route for some of the best mountain biking in the North West. The site access proposed is directly opposite a private drive and other driveways, making access to these driveways dangerous. There is no proposed traffic measures for the private access road opposite, meaning that vehicles would exit straight onto the junction.

20 houses get their bins collected outside this private drive once a week. The refuse vehicle would have to park in front of the pedestrian crossing blocking the road at the junction, this would cause congestion at the junction and would put the safety of pedestrians and vulnerable road users at risk.

Having considered the proposals there is concern that the safety measures proposed are not sufficient and may not meet the requirements for a development of the scale proposed, particularly in relation to sufficient visibility and potentially putting the lives of residents, vulnerable road users (cyclists) and the primary school children (just 250m from the junction) at risk.

A road safety audit has been mentioned as being necessary on several occasions but has been ignored, Lancashire County Council and RBC must consider this otherwise they are potentially breaching their responsibility to ensure safe day to day life of all residents in Edenfield.

- Double yellow lines in front of houses how will current residents access properties with shopping, babies, young children etc?
- Compensatory car park is not large enough and not fit for purpose recent audit identified between 35 and 40 cars parked every night; the car park appears to be open to new and existing residents therefore can't be compensatory; no spaces for potential trades/service personnel; no future proofing e.g. electric charging points; no disabled provision
- No phasing proposal for TW site therefore could be one big building site for next 10 years leading to traffic and pedestrian safety concerns
- Flood safety risk– SUDS too close to A56 where there is already a known failure of infrastructure/embankment, could reduce stability further on the A56 and put road users safety at risk

- No green spaces within the proposed housing development as recommended in the Places Matter Design Review Report cramped layout and poor design, the green space being on the western periphery, cost saving
- Maps incorrect affecting accuracy of traffic proposal and leading to further road and pedestrian safety concerns, No. 82 is no longer a single dwelling, Horse and Jockey has been demolished and there is now a new junction with houses Pilgrim Gardens
- Bus stop proposed to be removed and relocated there is no space to relocate
- Only one crossing point proposed at North side of the junction and not wide enough to incorporate cyclists– serious safety concerns for pedestrians particularly our very young vulnerable primary school children crossing Market Street from the south side
- Pavements not wide enough to ensure safety of pedestrians should be 2m wide.

Kind regards, Peter Haworth

Sent from Mail for Windows

FAO Rossendale Borough Council, Planning AND Forward Planning departments

Dear Sir/Madam,

Objection to revised Edenfield Masterplan and revised Taylor Wimpey Planning Application 2022/0451

We are writing to object to both the revised Edenfield Masterplan and revised planning application 2022/0451 for the reasons below.

- Masterplan: the amended Masterplan is still not comprehensive, it appears to include input from one developer (Taylor Wimpey) only.
- Phasing: Masterplan section 03 (p53 55): the table on page 54 simply lists the phases and key
 deliverables of each phase it does not address how the construction of the proposed
 developments would be implemented and managed.
- Parking: parking restrictions proposed for Market Street and Exchange Street would:
 - o prevent current residents parking close to their houses. The 'compensatory' parking areas are too far from the houses that would be affected by the proposed parking restrictions to be a practical alternative and have safety implications especially for those with young children, the frail and disabled.
 - o deter trade for established and any new local businesses, key facilities for the Edenfield community.

o the compensatory parking provision proposed on the Taylor Wimpey site and by releasing additional land from the greenbelt would not provide sufficient spaces for existing and new residents as well as the school.

• Green spaces and biodiversity:

- o Masterplan proposals to release further greenbelt land to be used for a car park, play area and school extension were not included in Rossendale Borough Council's (RBC's) Local Plan. Removing even more land from the greenbelt can only have a negative impact on biodiversity.
- o The Masterplan (Executive Summary page 8, point 5i) refers

to the policy requirement included in RBC's Local Plan 'Retention and strengthening of **woodland to the north and south of the Church'.** The Masterplan states (table on page 8) that this plan shows how existing woodland has been retained and strengthened *'notably to the south of the Church'*. Peel L&P may not have contributed to this Masterplan, however, from the diagram on page 46 it appears that Peel L&P propose to apply for permission to build on part of the woodland (we estimate around one third, possibly more) to the north of the Church/Church Lane. Building in this area of woodland is not addressed in the Masterplan and, if this is what Peel L&P propose, we

believe it conflicts with RBC's policy requirement that these woods are to be retained and strengthened.

o If Peel L&P were to build on part of the woodland to the north

of the Church this would have a negative impact on biodiversity. It would reduce the established habitat for wildlife in this area, disrupting established populations of small mammals, birds - including owls and great spotted woodpeckers, hedgehogs, badgers, foxes, bats and deer which have utilised this area for decades.

o The only green areas Taylor Wimpey's plans appear to include

are an area for a LEAP (locally equipped play area) and a buffer zone along the western boundary of H66 which would be landscaped. Taylor Wimpey do not appear to have taken account of the advice in the "Places Matter" report provided by RIBA North to break up the landscape 'by integrating green spaces with built form positively'. Overall the layout of the Taylor Wimpey site looks cramped, uninviting and not in keeping with the character of Edenfield.

o Masterplan, Table on Page 9, item 11: regarding the impact of

any future widening of the A56 on any dwellings facing the A56, the Masterplan states that it 'does include a stand-off along the western boundary which would not prejudice widening of the A56 in future.' **Please advise:**

is this 'stand-off' the same area of land that forms the buffer zone along the western boundary of H66 which Taylor Wimpey propose to landscape as a green area?

➢ If these are the same area and the A56 is widened in future, would this reduce the green space within the Taylor Wimpey site?

• Traffic and road safety – north area

o 2 new junctions proposed for:

- Car park on greenbelt land: this proposed car park is very close to the traffic lights at the existing 4-way fingerpost junction. Cars waiting to turn right into this car park and exiting it would add to the congestion at this junction.
- Access to Peel L&P's development site off Blackburn Road: the proposed access point from the field adjacent to no. 5 Blackburn Road is very close to vehicle access points for existing properties on both sides of Blackburn Road, and also to the traffic lights at the fingerpost junction, a 4-way junction which is already busy including with traffic parking to take children to and from school.
- o The current school crossing is uncontrolled and there are no pedestrian crossings on Blackburn Road or Burnley Road. Crossing these roads is already hazardous, especially for children and people with disability. The access point for the proposed Peel L&P development and proposal to release further land from the greenbelt to provide a car park would increase these risks.
- o The existing 4-way fingerpost junction is also very close to the entry/exit points to Church Lane and East Street, both of which narrow and particularly busy with pedestrians and vehicles at the beginning and end of the school day.
- o We live in Church Court, off Church Lane. Especially at the beginning and end of the school day negotiating pedestrians, including primary school children, crossing Market Street an uncontrolled crossing point at the school; traffic parked on both sides of Church Lane; car doors opening for passengers; and vehicles entering Church Court to turn is extremely hazardous. We are already concerned about the safety of pedestrians, cyclists and other traffic in the area round the fingerpost junction. Adding two new junctions close to the fingerpost junction can only increase these safety concerns.
- o If Edenfield CE Primary School were expanded as suggested in the RBC Local Plan, this would further increase traffic and concerns about safety in this area.

- o Masterplan page 48: the cycle path from the central/core site does not appear to link directly to the cycle path in the north of the village. From the diagram in the Masterplan it looks as if cyclists and pedestrians would have to cross Church Lane and cycle/walk along part of Church Lane to access the next section of cycle/pedestrian paths. Church Lane is narrow and is used by cars, vans, lorries, agricultural vehicles and refuse lorries to access properties on the east and west of the A56, it is not a motor-traffic free route for cyclists and pedestrians. If you walk down Church Lane you have to step onto the verge to allow cars and other vehicles to pass. If the Masterplan is proposing that Church Lane is used as a link between the cycle path from the central/core site to the cycle path in the north area this raises further safety issues.
- o When will a road safety assessment be completed to accurately assess the safety aspects of these proposals?
- Flooding: this is a recognised issue in the area, particularly in the valley below Edenfield. Climate change is likely to increase surface water issues in the area. Also building on the fields in Edenfield will reduce the drainage available for surface water and increase the risk of flooding onto the A56 and the communities in the valley below. We have noted that you are awaiting feedback from National Highways.

For the reasons above we object to both the amended Edenfield Masterplan and Taylor Wimpey's amended planning application 2022/0451.

Yours faithfully,

Ann E Durie and Nigel S Stacey
David Dewhurst

4 August 2023

Dear Sir/Madam

Edenfield Masterplan

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

The plan itself, again raises a number of concerns for me. I live on Market Street, Market Street, Market Street is an incredibly busy road throughout the day and even in the evening often cars pass through, especially when the motorway is closed. To introduce over 400 houses with the entrance at this point is ludicrous.

I have two young children, age 1 and age 3 and I have no off-road parking, I have to park the car outside my house. At times, the road is busy and I do not get a space outside my house. On these occasions it causes me severe stress trying to get my children in and out of the car, particularly when I'm parked across the road. Cars speed past me and it feels incredibly dangerous with my children, I often fear a car is going to take the car door off. Your proposal of restricting parking on the street will make things incredibly difficult for my family, I'm not sure how I will safely get my children in and out of the car/house on a daily basis. We just about manage now, I cannot imagine how much worse Market Street will be with the traffic of an additional 400 houses. In addition, practical considerations of having our cars parked in a different location to our houses raises a number of concerns, how will I get my shopping in the house? How will I get the pram in and out of the houses? How will I do any of these things with two young children – I cannot leave them alone in the car whilst I do this, nor can I leave them alone in the house.

Another huge concern for me is the infrastructure. In Edenfield we have one school and no healthcare. The surgery in Ramsbottom is over-subscribed and barely surviving. There are no proposals to open a new surgery. This means there will be more pressure on existing surgeries which I'm certain they cannot cope with. Similarly, with only one school in the area, it is unreasonable to expect Edenfield to take such a big increase in numbers of children. It is a small school with already large classes.

Finally the proposed phasing of the building works is not adequate. Simultaneous building by developers is mentioned which would be hugely disruptive to current residents, to expect us to live on a building site throughout this time is unreasonable. It would also mean chaos for traffic, which inevitably is dangerous for drivers and pedestrians.

I do not understand why the green belt land needs to be used. There's plenty of other land available which is not green belt. I imagine the reason for this is the desirable location which means higher prices which can be charged for housing – this is not a good enough reason.

To myself, and many other Edenfield residents, this planned development is just another example of the council and developers cashing in on a big development and not properly considering the impact on the local community. The developers too are only concerned about the money involved and residents' concerns are pushed to the bottom of the pile and disregarded. The current proposals are not safe, the proposed development is far too big for the size of the village.

I really do hope you listen to our concerns.

Regards

David Dewhurst

Erena Pillitteri

4 August 2023

Dear Sir/Madam

Edenfield Masterplan

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

The plan itself, again raises a number of concerns for me. I live on Market Street, directly opposite the proposed entrance to the new site. Market Street is an incredibly busy road throughout the day and even in the evening often cars pass through, especially when the motorway is closed. To introduce over 400 houses with the entrance at this point is ludicrous.

I have two young children, age 1 and age 3 and I have no off-road parking, I have to park the car outside my house. At times, the road is busy and I do not get a space outside my house. On these occasions it causes me severe stress trying to get my children in and out of the car, particularly when I'm parked across the road. Cars speed past me and it feels incredibly dangerous with my children, I often fear a car is going to take the car door off. Your proposal of restricting parking on the street will make things incredibly difficult for my family, I'm not sure how I will safely get my children in and out of the car/house on a daily basis. We just about manage now, I cannot imagine how much worse Market Street will be with the traffic of an additional 400 houses. In addition, practical considerations of having our cars parked in a different location to our houses raises a number of concerns, how will I get my shopping in the house? How will I get the pram in and out of the houses? How will I do any of these things with two young children – I cannot leave them alone in the car whilst I do this, nor can I leave them alone in the house.

Another huge concern for me is the infrastructure. In Edenfield we have one school and no healthcare. The surgery in Ramsbottom is over-subscribed and barely surviving. There are no proposals to open a new surgery. This means there will be more pressure on existing surgeries which I'm certain they cannot cope with. Similarly, with only one school in the area, it is unreasonable to expect Edenfield to take such a big increase in numbers of children. It is a small school with already large classes.

Finally the proposed phasing of the building works is not adequate. Simultaneous building by developers is mentioned which would be hugely disruptive to current residents, to expect us to live on a building site throughout this time is unreasonable. It would also mean chaos for traffic, which inevitably is dangerous for drivers and pedestrians.

I do not understand why the green belt land needs to be used. There's plenty of other land available which is not green belt. I imagine the reason for this is the desirable location which means higher prices which can be charged for housing – this is not a good enough reason.

To myself, and many other Edenfield residents, this planned development is just another example of the council and developers cashing in on a big development and not properly considering the impact on the local community. The developers too are only concerned about the money involved and residents' concerns are pushed to the bottom of the pile and disregarded. The current proposals are not safe, the proposed development is far too big for the size of the village.

I really do hope you listen to our concerns.

Regards

Erena Pillitteri

I wish to lodge an objection to the revised Taylor Wimpey Masterplan / Design Code incorporating Taylor Wimpey planning application 2022/0451.

Having viewed the revised Masterplan I have the following observations:

1. This second effort of a 'Masterplan' encompasses 2 out of 3 developers only – c. 87% of the total projected build. This does not fulfil the requirements established by Rossendale Borough Council.

2. The traffic plans embedded within this document amount to only road painting and parking restrictions to the detriment of current residents. Due to access constraints this opens up other areas to have parking restrictions imposed (Exchange Street / Eden Avenue / Highfield Road) to enable site access again to the detriment of existing residents on these roads.

3. The very limited 'traffic survey' accompanying the document is deeply flawed. It is based on very limited remote monitoring (3 days in late April) on quiet residential streets where the majority of traffic is for access only. As a result the extrapolated traffic figures show the roads in question to have much spare capacity. Capacity does not equal suitability. The obvious flaws in these assumptions are that these are not through-roads, the roads are not intended for LGV usage, and to make Exchange Street, itself with limited access from Market Street, a one-way street then means all vehicles exiting the site (Chatterton Hey), and possibly Taylor Wimpey, are funnelled out via Highfield Road and Eden Avenue.

4. The traffic survey on Market Street is also flawed and unrealistic (e.g. the 4 month overnight closure of the adjacent A56 does not factor into any of these results). Regular rush hour problems on the A56, North and South bound, more than double present traffic volume on regular occasions (at the time of compilation there has been an LGV accident on the A56 resulting in 3 hours of congestion along Bolton Road North and Market Street, 01/08/2023).

5. There is no detail whatsoever of the build scheduling, in fact one developer (Northstone) having held a limited consultation have disappeared completely from the document.

6. Site drainage (via SUDS) is briefly mentioned. This poses two separate dangers. One to the A56 c. 30 metres away from the proposed siting and a danger to life from an unsecured body of water.

7. There are no details of any pollution mitigation measures during or post build phases.

8. There are no practical infrastructure measures to accommodate what ultimately would be a 50% increase in the village population (e.g. schools, health services etc).

9. The style, build and more importantly the density of the new builds are not covered, neither are green space / recreation areas detailed.

10. As previously alluded to approx. 13% of the total build (Northstone site at the North end of H66) is not covered in any way other than their proposal of a car park adjacent to the school on yet more Green Belt Land.

In view of these points highlighted, I submit that this second attempt is not the required plan mandated by RBC.

7 months on from the original (TW) attempt which was submitted in conjunction with their planning application there is very little more actual detail contained, almost all extra information could / should have been provided at the time of the original submission.

All the proposals come to the detriment of current residents (parking, vehicle displacement, use of unsuitable access routes) with no practical solutions.

In lieu of all these points I therefore submitted that this 'Masterplan' be completely rejected as it is clearly deeply flawed and incomplete along with the accompanying planning application.

Peter Dawson

Dear Sirs,

I wish to comment on the revised Edenfield Masterplan (Taylor Wimpey Masterplan).

The plans, although revised, are still based around a densely packed housing estate using "off the shelf" designs totally unsuitable for the character of Edenfield.

Suggestions that quality materials (e.g. stone) should be used seem to be ignored.

None of the issues previously raised seem to be addressed. These include school provision, healthcare, drainage and flood risk.

The Market Street corridor proposals are unworkable and I detail the issues applying to the southern end of Market Street, where I myself live.

This is the area between the junctions with Heycrofts View and the mini roundabout at Rochdale Road/Bury Road.

Parking is often difficult in this section of Market Street. Most of the shops and businesses are located in this area along with 27 residential properties with no off street parking. It is proposed that parking restrictions are introduced along the western side of Market Street with no alternative parking available. Overspill parking at present utilises the footpaths of Heycrofts View.

If implemented the restrictions would leave approximately 21 on street parking spaces. Competing for these would be the 27 residential properties, many of which have more than one vehicle, along with the shops & businesses. This includes: M Cook, Butchers

Celeste Arnold, Hairdressers Sixsmiths, Bakers VIP Barbers Forever Treasures, Photographers My Plaice, Fish & Chips Scout Moor Pharmacy Canine Solutions Golden Kitchen, Takeaway School of Rock Blemish Clinic "A Story Called" Designers Drop Off Cafe The Provident Society (Function Room catering for up to 130 people)

None of these have any off street parking and would be severely impacted by any parking restrictions.

It is understood that parking causes a "pinch point" on Market Street. However, without this it is likely that some other traffic calming methods may have been necessary. The proposals to enable the increased traffic move faster through the village are a serious road safety concern.

Edenfield simply does not have the necessary infrastructure for a development of this size. A determination to make it fit to the detriment of the existing residents is just not acceptable.

Yours sincerely,

Phillip Dawber, Lynda Dawber, Simon Hill

I wish to lodge an objection to the revised Taylor Wimpey Masterplan / Design Code incorporating Taylor Wimpey planning application 2022/0451.

In addition to the below, which I composed with my husband, I would like to add the following:

The 'low usage' traffic that was detected by the monitors on Highfield Road has missed the point that this is not a through-road used by traffic; the cars detected actually park on these streets which means that only one vehicle can pass at any one time. To increase this traffic by using it as a site access / egress from the new estate, travelling by the children's play area / skate park, will mean that this will endanger the children and foreseeably make this road, and neighbouring side roads with blind bends, future KSI (Killed Seriously Injured) sites.

In addition, the SUDS proposed which will contain stagnant (eventually rancid) water also has a foreseen risk of children drowning. In addition, as it is so close to the A56 and the embankment is unstable, should this overflow onto that busy by-pass the accident this would cause would be substantial with a real risk to life.

In the event of these foreseeable risks, who will be held accountable under The Corporate Manslaughter Act 2007 as these will be classed as 'failures in the management of health and safety where a fatality occurs'? Will it be the building developers or the council who sign off the traffic plans / SUDS?

In the current climate of introducing Low Emissions Zones to reduce air pollution to prevent early deaths and children having breathing difficulties, why is it deemed reasonable by Taylor Wimpey and RBC to increase traffic pollution by c. 1,000 cars onto roads with high density housing each side of these roads (driving past children's play areas) onto the existing residents of this small village?

Having viewed the revised Masterplan I have the following observations:

1. This second effort of a 'Masterplan' encompasses 2 out of 3 developers only – c. 87% of the total projected build. This does not fulfil the requirements established by Rossendale Borough Council.

2. The traffic plans embedded within this document amount to only road painting and parking restrictions to the detriment of current residents. Due to access constraints this opens up other areas to have parking restrictions imposed (Exchange Street / Eden Avenue / Highfield Road) to enable site access again to the detriment of existing residents on these roads.

3. The very limited 'traffic survey' accompanying the document is deeply flawed. It is based on very limited remote monitoring (3 days in late April) on quiet residential streets where the majority of traffic is for access only. As a result the extrapolated traffic figures show the roads in question to have much spare capacity. Capacity does not equal suitability. The obvious flaws in these assumptions are that these are not through-roads, the roads are not intended for LGV usage, and to make Exchange Street, itself with limited access from Market Street, a one-way street then means all vehicles exiting the site (Chatterton Hey), and possibly Taylor Wimpey, are funnelled out via Highfield Road and Eden Avenue.

4. The traffic survey on Market Street is also flawed and unrealistic (e.g. the 4 month overnight closure of the adjacent A56 does not factor into any of these results). Regular rush hour problems on the A56, North and South bound, more than double present traffic volume on regular occasions (at the time of compilation there has been an LGV accident on the A56 resulting in 3 hours of congestion along Bolton Road North and Market Street, 01/08/2023).

5. There is no detail whatsoever of the build scheduling, in fact one developer (Northstone) having held a limited consultation have disappeared completely from the document.

6. Site drainage (via SUDS) is briefly mentioned. This poses two separate dangers. One to the A56 c. 30 metres away from the proposed siting and a danger to life from an unsecured body of water.

7. There are no details of any pollution mitigation measures during or post build phases.

8. There are no practical infrastructure measures to accommodate what ultimately would be a 50% increase in the village population (e.g. schools, health services etc).

9. The style, build and more importantly the density of the new builds are not covered, neither are green space / recreation areas detailed.

10. As previously alluded to, approx. 13% of the total build (Northstone site at the North end of H66) is not covered in any way other than their proposal of a car park adjacent to the school on yet more Green Belt Land.

In view of these points highlighted, I submit that this second attempt is not the required plan mandated by RBC.

7 months on from the original (TW) attempt which was submitted in conjunction with their planning application there is very little more actual detail contained, almost all extra information could / should have been provided at the time of the original submission.

All the proposals come to the detriment of current residents (parking, vehicle displacement, use of unsuitable access routes) with no practical solutions.

In lieu of all these points I therefore submitted that this 'Masterplan' be completely rejected as it is clearly deeply flawed and incomplete along with the accompanying planning application.

Joanne Ash

<u>Feedback on Revised Masterplan and Design Code for Edenfield/Market Street and Planning</u> <u>Revised Taylor Wimpey (TW) Planning Application 2022/0451</u>

6th August 2023

Name: Helen McVey Address:

Overall I object to the revised masterplan, design code and TW planning application, below is my feedback and rational for the reason of my objection. This is based on my concern that neither meet the obligations set out in Rossendale Borough Council Local Plan (RBCLP), which summarises the requirements of the building inspectorate upon the release of greenbelt for any potential development of the H66 site:

RBCLP: The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing

This requirement is not being met. The masterplan is a TW masterplan not a comprehensive masterplan for the whole site as all the developers have not contributed to the masterplan and one in particularly has asked previously for their name to be removed from the plan.

On this basis there are too many assumptions within the plan and no definite detail to consider, as it would rely on the other developers agreeing to TW's proposal and a combined plan for implementation, and there is no indication of this.

Either RBC need to take over and manage the Masterplan process to ensure it is comprehensive for the entire site and meets the needs of both existing residents and the development of the H66 site or they need to ensure the developers work together to produce a comprehensive plan with involvement of Edenfield Community Neighbourhood Forum and local residents, as is also a requirement of RBC local plan. Until this has been done the TW planning application and any other planning applications that may be subsequently received by the other developers should either not be considered or rejected on this basis, until a comprehensive Masterplan is agreed and approved.

The proposed Masterplan and planning application by TW completely changes the village, the plans stating that the TW development will become the core of the village. This demonstrates the complete disregard that TW have for existing residents and the village as it is, in their haste to seek planning approval. The core and heart of the village has always been Market Street this is where the Church, School, shops etc. are and should remain the core of the village. This needs to have full and equal consideration in any proposed Masterplan.

Within the proposed Masterplan and TW planning application there is insufficient information on phasing and actually details simultaneous development. Potentially Edenfield could be one big building site for the next 10 years. This would be absolutely disastrous to current residents living in the village as it would cause road chaos, traffic and pedestrian safety concerns and challenges commuting. It could also impact negatively on people's health and wellbeing, due to noise, pollution of development etc. On this basis both the Masterplan and TW planning application should be rejected until details of a suitable and safe plan for phasing can be agreed.

RBCLP: 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 (sic) Arms. Measures to assist pedestrian and vulnerable road users will be required.

The proposed Materplan and TW planning application does not meet this requirement, for the following reasons: -

- The traffic assessment is only for the TW site and does not take account of all proposed sites.
- There are serious concerns for the traffic assessment for the TW site, particularly from the filed opposite nos. 88-116 Market Street:
 - The assessment is insufficient as it is based on 2030 traffic data and should be based on at least 2040/50 to be realistic for the future impact on the village, especially as building is expected to take 10 years overall. It also focuses only on the 238 houses and doesn't take account the development overall of 400 houses
 - The traffic assessment should discount Covid and the recovery period after, as it gives a false representation of traffic impact
 - The junction proposed is directly opposite an access road which has serious safety concerns, traffic potentially coming head on with no controls, there will also be safety issues because of this for pedestrians and for cyclists. This is also where residents in the terraced houses currently place bins for collection weekly, which would cause an obstruction at the junction and potential safety issues
 - There is an assumption that traffic will travel left to access the A56 to Bury/Manchester, Burnley etc. This is not what is experienced as a resident and also not the way the signs in Edenfield currently direct the traffic
 - The traffic assessment ignores the new junction of Pilgrim Gardens where I live, it still referring to the Horse and Jockey pub, and hence ignores the impact of this junction to the new TW access junction. The junction from Pilgrim Gardens is already challenging from a visibility point of view and there have been several occasions where I have had a near miss incident because of this, this will only become worse with the development of the TW junction, and pose a further safety risk re visibility
 - There are at least 30/40 cars parked daily where the new junction to the TW site is proposed, these people will be displaced from parking near their houses due to the junction and parking restrictions applied adjacent to the junction. The 13 compensatory car park spaces are insufficient and in fact not compensatory as on the plans they are designated general parking area for both for the development and visitors to Edenfield, there is also no mention of disabled parking
 - The road is not wide enough to accommodate the junction safely, the visibility of the junction is affected by the houses both on Pilgrim Gardens and Market Street
 - The pavements are not wide enough to accommodate the junction, particularly the pavement opposite the new proposed junction is very narrow and would need to be widened to ensure pedestrian safety, particularly young children walking to school, babies in prams/pushchairs
- The Masterplan proposes a whole new road structure for the North, Central and South of Edenfield, hence the traffic assessment should be comprehensive and based on the whole of Edenfield not just the TW site
- Blackburn Road, Market Street and Bury Road is the only main diversion route for when the A56 is closed due to maintenance or as a result of an accident, this means there are times when these roads are much busier and this should be taken into account in any traffic assessment or traffic audit. This does not appear to have been considered. However on these occasions which happen frequently, as on these traffic, cyclists and pedestrian safety is an increasing cause of concern due to the increased number of vehicles including large commercial lorries and vans, which often lead to the road becoming blocked to two way traffic
- On the North site I have serious safety concerns for the proposal of the road structure at the school junction of Burnley Road, Market Street and Blackburn Road, already a busy junction, for the following-reasons: -

- Two further junctions to accommodate the housing development and proposed car park would take the number of junctions in one small area to 8
- \circ The new junctions would increase the amount of traffic at these junctions significantly
- It is unclear how the gateway proposed would have an impact, a recent illuminated site placed at the junction during a diversion from the A56 was completely ignored and had no traffic calming impact
- There are no additional crossing points on Burnley Road or Blackburn road and hence this poses a particular safety concern for young children, frail, elderly and disabled residents in the village
- On the South Side I have serious concerns for the proposed traffic measures on Exchange Street, particularly as there is no mention of the new cycle pump traffic. The pump traffic has resulted in more cars, cyclists and pedestrians in Edenfield than before as people now visit the village for this reason as well as existing residents using the track. It has been very positive for the wellbeing of children and young people, getting regularly use daily, however this is now being put at risk as is the safety of the children who use it. The proposed new junction to the Anwyl land at the junction of Highfield Road/Exchange Street is directly opposite the pump track and adjacent to the children's play area and has the potential to put the lives of children at risk as they exit the pump track on what will be a busy junction. My grandson regularly plays here and I have serious concern for his safety if this was to go ahead.

Highfield Road and Exchange Street are also not safe access to the Anwyl land. Even if Exchange Street were to be made one way as proposed the road and pavements are narrow, and are not be suitable for construction/large vehicles. The junction of Market Street/Exchange Street is not wide enough and there would be a blind left turn onto Exchange Street, potentially posing a major safety concern particularly for pedestrian safety. Highfield Road is often double parked and children play outside the houses and use the road to access the play areas pump track, playground and recreational field. Due to double parking on Highfield road, visibility as a driver is limited and poses a safety risk for pedestrians, particularly young children, frail and disable now without the further impact of traffic for another 100 houses.

- The whole of Market Street is currently busy without the impact of 400 houses, for those who are frail
 and elderly and those with children and babies it is difficult to safely cross the road already and this will
 only be exacerbated with the addition of 400 houses and increased traffic. Compensatory measures to
 support road crossing seem insufficient as pedestrian crossings only seem to have been proposed where
 they fit, not where they are needed to support safe crossing.
- Public transport (bus) services have been reduced recently and are much less frequent meaning that more people have to rely on their own transport rather than public transport, this will undoubtedly mean that more people will be reliant on their own cars and hence increase traffic on the roads, and needs to be taken into consideration in any transport assessment for the whole site.
- The parking restrictions proposed to accommodate the Masterplan mean that people will not be able to park or will be restricted from parking outside the shops/businesses which will significantly affect footfall to them and could potentially result in closure. There is an assumption that only people access the shops from the village, however due to their excellent reputation it is known that people come from outside the village and which is what makes them viable as businesses. With government levelling up plans promoting business development it is wrong that businesses could be negatively affected.
- The parking restrictions proposed will displace current residents from parking outside their houses particularly frail, elderly and those pregnant and with children and babies. The only means they will have are proposed compensatory parking which is general parking therefor not compensatory and which requires an ability to walk to for children and the frail and disabled. This is therefore discriminatory and goes against the principles of the Equality Act 2010. The Masterplan proposal benefitting the protected characteristics of people in the new development particularly in relation to access and parking and driveway width etc. at the detriment of the protected characteristics of existing residents resulting in direct and in direct discrimination of existing residents.
- Overall there is no road safety audit, hence as detailed above until this is undertaken there are serious safety concerns caused with the proposed new road structure, particularly for existing residents.

RBCLP: Specific criteria for the design and layout needs (sic) to take account of: i. Retention and strengthening of the woodland enclosures to the north and south of the Church ii. The layout of the housing

parcels should be designed to allow views to the Church to continue iii. The relationship of the new dwellings to the Recreation Ground to ensure safe non-vehicular access is provided iv. Public open space to be provided along the woodland area south of the brook/Church enclosure v. Landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development and provide a buffer to the new Green Belt boundary vi. Materials and boundary treatments should reflect the local context

- The concern re the proposed Masterplan is that it is hard to comment on this as all developers have not inputted into the plan and hence there are assumptions made that have not been committed to, until this is clarified the Masterplan should be rejected
- With regards to the TW site the development is cramped with buildings and there is a lack of green/landscaped spaces within the sight to 'soften the overall impact of the development'. This therefore ignores the local plan and also the Places Matter Design Report which was produced following the initial planning application. This is particularly pertinent to myself and my neighbours as we will look directly out onto buildings and no green space, in comparison to the lovely green space we have now

RBCLP: Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4 8.

• Compensatory improvements in the TW planning application are unclear and there is no real commitment from TW, until this can be clarified planning permission should not go ahead

RBCLP: Geotechnical investigations will be required to confirm land stability and protection of the A56, and consideration paid to the suitability or not of sustainable drainage systems on the boundary adjoining the A56 9.

The issues of flooding and potential impact on the A56 have not been addressed. I have had several very
scary experiences of flooding whilst driving on the A56 which have almost caused an accident, I'm also
aware of incidents where flooding has caused accidents on the A56. The proposed building on land which
already floods poses an increased flood risk both for Stubbins, Irwell Vale and the A56, the SUDS located
close to the A56 also pose a serious safety concern of further flooding as located so close to the bypass.

Provision will be required to expand either Edenfield CE Primary School or Stubbins Primary School from a 1 form entry to a 1.5 form entry primary school, and for a secondary school contribution subject to the Education Authority.

- This is mentioned in the Masterplan but there is no firm plan detailed, this needs to be incorporated into the Masterplan and on this basis the Masterplan should be rejected until a plan for education is approved
- TW planning proposal provides no provision for education, them stating that their calculations do not indicated any additional requirement. This contradicts the local plan and LCC objection to the original TW planning application. Also it fails to take account the development of the 400 houses in total.
- There is no mention in either the Masterplan or TW planning application how the additional needs of secondary school placements will be met.

In addition to the above concerns that the Masterplan and TW planning application do not meet the requirements of RBCLP, there are also other reasons for my objection: -

 Concerns of existing residents and Edenfield Community Neighbourhood Forum (ECNF) are not being adequately addressed – TW quote having a consultation however this was rushed in the height of summer with no feedback to emails or social media enquiries, there has been no further consultation since despite the revised masterplan and revised planning application being put forward by them. In the initial consultation phase I raised questions with them particularly in relation to transport and phasing on both email, Facebook and Facebook messenger but with no response.

- The design code is not in keeping with the current village, it gives very little consideration of the design code produced by Edenfield Community Neighbourhood Forum in conjunction with RBC and mentioned positively within the Places Matter Design report, particularly in relation to the inclusion of 2.5 storey houses, green spaces, building materials and should be rejected on this basis
- There are insufficient amenities proposed for the size of development as was a recommendation of the Places Matter Design report, no consideration has been given to health and social care provision particular GP, hospital and dental provision despite the objections by East Lancashire Hospitals trust and the Integrated Care Board to the initial planning application and Masterplan. Currently existing residents struggle to get GP and dental access when they move to the village, this will be further exacerbated with the development of the H66 and must be a requirement of the Masterplan before any planning application is event considered. I'm aware that this could be part of a section 106, however to fulfil this requirement requires more than money, there is insufficient medical, clinical and social care professionals overall to fulfil the requirement for the size of development
- There are also no other facilities such as shops as is propose in the Places Matter Design review report, in fact it is more than likely these will be reduced further due to parking restrictions. This only adds to the traffic chaos and safety concerns as residents will have to leave the village to access facilities and amenities.
- The proposal for further release of Greenbelt for the school, play area and car park at the north side of the village is unacceptable as it removes further Greenbelt and greenspace from the village (particularly the proposed car park) in addition to that already agreed in RBCLP for the H66 site and will have an adverse effect on the environment/ecology/water drainage and also sets a precedent for further release in the future which is unacceptable and will have a negative effect on future generations.

Overall my objections to the Masterplan and TW planning application are based on an overarching concern that the Masterplan and TW planning application are inadequate and fail to meet the requirements of RBCLP for a comprehensive Masterplan and traffic assessment for the whole H66 site upon release of the greenbelt. That due to this there are serious safety concerns for traffic, cycle and pedestrian safety that are not adequately addressed and pose a high risk. In addition to this the proposals are discriminatory under the Equality Act 2010, the needs and protected characteristics of residents being ignored whilst full consideration being given to the protected characteristics of residents who are to live in the new houses, so fixed are the plans on development of the H66 site.

13 Highfield Road,

Edenfield, BLO OLB.

10th July, 2023.

Dear Sir,

Revised Local Plan re-submitted by Taylor Wimpey.

As a life-long resident of Edenfield (74 years) I am very concerned about the proposed access routes as well as loss of street parking outlined in the latest plan and give below my main concerns:-

- 1) The plan to make Exchange Street 'one way' traffic would create noise, pollution and on-going disruption on the access roads, namely Highfield Road, Eden Avenue and The Drive and will make what has been a reasonably quiet area into an unsafe and dangerous territory particularly for the young children using the pump track and recreation ground.
- 2) The loss of on-street parking for the residents of Market Street which will affect many houses and also businesses and the main road cannot cope with all the extra volume of traffic generated by these proposals. It is a well-known fact that Taylor Wimpey has a bad reputation for building work and show a total disregard for existing properties and communities.

Please would you be very mindful of the points I have raised when you consider the Local Plan and before village life is destroyed for future generations?

Thank you.

Your<u>s faithfully,</u>



(Mrs). Susan E. Wallwork

For the attention of:

Forward Planning, Rossendale Borough Council, Futures Park, Bacup, Rossendale OL12 0BB

Ref: Objection to the revised Planning Application, Ref no. 2022/0451, Edenfield Masterplan Address and site: Land west of Market St., Edenfield, Lancashire

Dear Sir/ Madam

I wish to lodge my objections to the proposed revised plans for the following reasons:

1. Lack of comprehensive overall Masterplan.

I am concerned that the revised Masterplan appears to have been prepared by only one of the interested parties (Taylor Wimpey) rather than by all the proposed developers.

My concern is that development will be piecemeal and lack coherence without a considered overall strategy re design, green space, landscape and particularly re a planned, phased construction strategy.

The lack of this will cause unacceptable and prolonged disruption, distress and inconvenience to existing residents, local businesses and road users.

2. Surface water run off mitigation

As a resident of the flooding vulnerable village of Irwell Vale, I am very concerned to learn that the proposed SUDS (Sustainable Urban Drainage System) strategy has been found to be an unsuitable strategy in relation to the topography and ground conditions in the area.

Surface water run off has caused many more flooding incidents in Irwell Vale over the years than high river levels. The risk of exacerbating the amount of surface water flowing down the hills to our valley location is obviously of extreme concern to all residents in Irwell Vale, therefore I seek your assurance that planning permission will not be granted without the guarantee that a robust and fit for purpose SUDS strategy is in place to mitigate this risk.

3. Traffic congestion

There is no agreed comprehensive traffic masterplan for the entire site, and no traffic assessment or road safety audit.

As a car user who regularly uses the roads up to and through Edenfield, I am very concerned about the serious impact of many extra vehicles on cyclist, pedestrian, animal and vehicle safety.

Although the report from Eddison notes traffic levels have reduced compared to pre pandemic levels, it does not consider the probable sizeable increase in traffic as working from home ceases to be the norm post pandemic.

The congestion along Market St. is currently very heavy not only am and pm, but also at school leaving times.

Add to that a further 600 or so vehicles (a conservative estimate) that will arrive with the new developments, travel through the village will become even more difficult.

The traffic controls proposed are actually danger points, especially for children, cyclists and horse riders.

On the several occasions when accidents or roadworks on the A56 Edenfield bypass, traffic is diverted through Edenfield, causing huge backlogs and creating particular danger points outside the primary school and at the mini roundabout at the other end of Market St., and misery for all current residents.

4. Parking limitations and proposals

These proposals are all geared to the advantage of the development sites and are to the detriment of the existing residents, businesses and volunteers who maintain areas of the village for the benefit of all.

The ability to park near homes, businesses and worksites is of crucial importance, particularly to older residents, local customers and those needing to carry heavy equipment.

I believe these proposals are discriminatory. Existing residents, local businesses and others who regularly need to park on Market St., Exchange St and other local streets should not take second place to newcomers.

Has an Equality Impact Assessment been undertaken?

5. Character and Greenbelt

Edenfield is a small community of only 2053 (2011 Census). The proposed development will significantly increase the population of the village by potentially 50%

This substantial increase in population will have a dramatic impact on both the character of the village and on the existing infrastructure.

I am concerned that there is a lack of green or landscaped spaces within the TW site, ignoring the recommendations in the Places Matter Design Report.

I also note that, having already removed the green fields from the west side of Edenfield, including the field of wild orchids adjacent to the Recreation ground, it is now proposed to remove the only remaining roadside area of green belt in order to form a car park.

The character of Edenfield village will be changed irrevocably if these schemes are implemented as they are.

Please confirm how the proposed developments will mitigate the impact, through design, scale and impact of the development, on the existing village character.

Dorothy A Stewart

31st July 2023

For the attention of:

Forward Planning, Rossendale Borough Council, Futures Park, Bacup, Rossendale OL12 0BB

Ref: Objection to the revised Planning Application, Ref no. 2022/0451, Edenfield Masterplan Address and site: Land west of Market St., Edenfield, Lancashire

Dear Sir/Madam

I am writing as Chair of the Edenfield and District Horticultural Society to lodge our objections on behalf of the Society to the proposed Revised Plans (2022/0451) for the following reasons:

1. Parking limitations and proposals

These proposals are all geared to the advantage of the development sites and are to the detriment of the existing residents, businesses and volunteers who maintain areas of the village for the benefit of all.

The ability to park near homes, businesses and worksites is of crucial importance, particularly to older residents, local customers and those needing to carry heavy equipment to carry out tasks.

Members of the Horticultural Society are responsible for the maintenance of planting at the Memorial Garden on Market Street.

We carry out regular weeding and maintenance work parties and the ability to park close to the Memorial Garden, and transport the equipment necessary to carry out this work, is of paramount importance if we are to continue in this role.

The make up of the Society membership who are regular maintenance volunteers is of an older age group, and therefore it is important that we are able to park close by as many of us are unable to carry heavy equipment over a long distance.

We believe these proposals are discriminatory.

Existing residents, local businesses and others who regularly need to park on Market St., Exchange St and other local streets should not take second place to newcomers.

Has an Equality Impact Assessment been undertaken?

1. Character and Greenbelt

Edenfield is a small community of only 2053 (2011 Census). The proposed development will significantly increase the population of the village by potentially 50%

This substantial increase in population will have a dramatic impact on both the character of the village and on the existing infrastructure, changing the character and landscape of this village.

The Society is concerned that there is a lack of green or landscaped spaces within the Taylor Wimpey site, ignoring the recommendations in the Places Matter Design Report.

We also note that, having already removed the green fields from the west side of Edenfield, including the field of wild orchids adjacent to the Recreation ground, it is now proposed to remove the only remaining roadside area of green belt in order to form a car park.

The character of Edenfield village will be changed irrevocably if these schemes are implemented as they are.

Please confirm how the proposed developments will mitigate the impact, through design, scale and impact of the development, on the existing village character.

Dorothy A Stewart. Chairperson, Edenfield and District Horticultural Society. 31st July 2023

MASTERPLAN AND PLANNING APPLICATION 2022/0451

We are writing to formally object to the current Masterplan and Planning Application 2022/0451. As residents, we hold several concerns that we believe are not adequately addressed in the existing proposal.

Firstly, the Masterplan's lack of comprehensive structure is concerning. We understand from the information provided that the revised Masterplan solely represents the views of Taylor Wimpey, and it appears to disregard the necessity of a cooperative approach. We strongly advocate that the Rossendale Borough Council (RBC) or all four developers take the lead in the process, as required by the RBC Local Plan, to ensure that the interests and concerns of the community are heard and reflected.

Secondly, the proposal doesn't seem to include an exhaustive traffic assessment or road safety audit for the entire site, which is similarly concerning. There are significant traffic, parking, cycle, and pedestrian safety issues, especially in relation to Market Street and the proposed new junctions across the North, Central and South of the village. These concerns will only be exacerbated by the simultaneous construction activities mentioned, a proposal that seems impractical and unsafe.

Moreover, infrastructure such as schools and healthcare, crucial for a development of this magnitude, appears to be overlooked. An assessment should surely be conducted to understand the extent of the need for these facilities, and the plan should reflect the necessary provisions for the same.

The current proposal also fails to adhere to the Design codes as detailed in the Neighbourhood Plan produced for ECNF, and thus, runs the risk of creating an uninspired, cramped development of bland properties out of character with the existing village, lacking in necessary green spaces and potentially causing ecological damage. Issues like rainwater pollution and flood risk have not been adequately addressed, with Sustainable Urban Drainage Systems proposed close to the A56 posing serious road safety issues.

The equality impact of the development raises further concerns. There is a risk of direct and indirect discrimination against existing residents, especially those who are frail and disabled. We believe it is the duty of RBC, under the Equality Act 2010, to ensure that no such discrimination occurs. An equality impact assessment must be undertaken, which also includes the current residents' concerns.

Finally, we object to the proposed further release of the Greenbelt for a school, play area and car park in the northern side of the village. This doesn't align with the RBC Local Plan and could result in a significant environmental impact, including ecological damage and potential water drainage issues.

Taylor Wimpey are hardly renowned as an aesthetically considerate development company, seemingly totally focused on profit as exemplified by their much criticised and publicly rejected attempt at introducing stepped increases in leasehold rental charges.

In conclusion, we urge Rossendale Borough Council to reconsider and re-evaluate the current proposal, not undermine, the existing character and functionality of our village.



Contact:

Date: 17 July 2023

Dear Rossendale Local Planning Authority,

Edenfield Masterplan and Design Code Consultation Response (Reconsultation)

Thank you for inviting Lancashire County Council's Flood Risk Management Team to comment on the above consultation. Lancashire County Council is the Lead Local Flood Authority (LLFA) for the County Council's administrative area. The Flood and Water Management Act (FWMA) sets out the requirement for the Lead Local Flood Authority to manage 'local' flood risk (flooding from surface water, groundwater, and ordinary watercourses) within their area. In the planning process, the Lead Local Flood Authority is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015.

The Lead Local Flood Authority has reviewed the Land West of Market Street, Edenfield (Allocation H66) – Masterplan and Design Code (June 2023, Randall Thorp) and has the following comments:

The Lead Local Flood Authority are pleased to see that the applicant has taken on board many of our comments from our original response (dated 12 December 2022). For example, a clear landscape design principle for watercourses, stating that "proposals must not culvert existing watercourses. Watercourses must be integrated into the urban design, creating multi-functional open spaces where people feel connected to the water environment". This principle is supported by the Lead Local Flood Authority and is consistent with our guidance on watercourses set out in the <u>Lancashire SuDS Pro-forma and accompanying guidance</u>.

The revised masterplan clarifies through code NA 05 that each phase of the allocation will have its own drainage system, with separate outfalls, SuDS components and maintenance arrangements. Therefore, surface water flood risk and surface water drainage considerations can be considered for each phase as part of a site-specific flood risk assessment and sustainable drainage strategy. This effectively removes the need for a masterplan. For the avoidance of doubt, a site-specific flood risk assessment and sustainable drainage strategy must be provided as part of the associated planning application for each phase in line with the National Planning Policy Framework and should meet the expectations and requirements as set out in the Planning Practice Guidance and Lancashire SuDS Pro-forma and accompanying guidance.

Lancashire County Council

However, the revised masterplan still relies on the use of end-of-pipe attenuation ponds along the western boundary of the allocation. These end-of-pipe solutions do not deliver source control or multifunctional benefits, and, while managing surface water quantity at a site scale, are not part of a wider, multifunctional SuDS. The SuDS must be integrated throughout the development to promote biodiversity and wider environmental net gains, generating the wider multifunctional benefits required through local plan policy ENV9. In addition, the location of such large volumes of water next to the highway presents a significant residual risk that must be addressed through any associated planning application.

While code NA 03 seeks to prioritise multifunctional SuDS in line with policy ENV9, code NA 04 leaves the selection of SuDS components to individual developers in the allocation. While this is acceptable to the Lead Local Flood Authority, the Local Planning Authority may wish for SuDS design to be considered holistically across the allocation to ensure the continuity of SuDS components and place-making across the different phases, with a selection of preferred SuDS components set out in the design code. The Local Planning Authority may also wish for the discharge locations for each phase to be considered through the masterplan as the location of the discharge points may have a material impact on the layout of the allocation and the associated provision of SuDS and landscaping across the area.

What This Response Does Not Cover

This response does not cover highway drainage, matters pertaining to highway adoption (s38 Highways Act 1980) and/or off-site highway works (s278 Highways Act 1980). Should the applicant intend to install any sustainable drainage systems under or within close proximity to a public road network (existing or proposed), then they would need to separately discuss the use and suitability of those systems with the relevant highway authority.

I hope that you find these comments valuable. Should you wish for further information or clarification on the contents of this letter please contact us at the email address provided.

Yours faithfully,

Phil Wadley

Lead Local Flood Authority

Review of revised Masterplan and Design Code for Edenfield

Introduction

I reviewed the first iteration of the Masterplan and Design Code for RBC in April 2023, and I have been asked to comment on the revised edition (June 2023)

Comments on latest version of Masterplan and Design Code

An executive summary has now been included and this sets out in table form how the document complies with policy H66.

Clause 5v of the policy requires 'landscape throughout the site to soften the impact of the development and provide a buffer to the new Green Belt boundary'.

The table explains how the Masterplan and Design Code complies with this: 'The Masterplan includes a substantial buffer along the western boundary to include landscape structure planting, with detail to be refined/agreed through individual planning applications.'

Although the new section describing green blue infrastructure principles loosely outlines proposed green corridors, these provide no further landscaping than that shown on the original version of the masterplan. The masterplan offers no specific guidance for soft landscape **within** the development area and therefore does not comply with clause 5v of policy H66 which requires landscape **throughout** the site.

Guidance Notes for Design Codes¹ in the Section Nature states in clause N.3.iii: *Street trees provide habitat, shading, cooling, air quality improvements and carbon sequestration, as well as being a vital component of attractive places. It is the government's intention that all new streets include trees and the Urban Tree Challenge Fund is planting 130,000 urban trees across England.*

Clause 5vi of the policy requires that 'Materials and boundary treatments should reflect the local context.' Some analysis of local boundary treatments are now included in the section on context, however the resulting guidance on paving materials is still very weak. The revised proposals give clearer guidance on what boundaries should be used where in the section on Area Types. Further guidance is required to clarify whether native hedge or drystone wall boundaries are going to be used at the interface between the new development and the edge of the green belt. Is close boarded fencing to be used and is this to be exclusively between rear gardens? I am concerned that there is still no reference to the treatment of retaining walls as these are shown extensively on the detail drawings, and many substantial walls are proposed in brick which would be extremely out of keeping.

I am pleased to see that natural stone is now included as a preferred building material for Edenfield North, it would be good to see its use more widespread, which would enhance the local distinctiveness of the proposals and reduce their carbon footprint.

Stakeholder Engagement

The Edenfield Neighbourhood plan produced by AECOM should be considered more fully, while it doesn't support the allocation of housing on H66, there are many valid points within the report which are relevant to this Masterplan and Design Code.

¹ Guidance notes for Design Codes Ministry of Housing, Communities and Local Government January 2021

Context

The visual analysis of the site fails to recognise the importance of long views to Peel Tower and Emanuel Church to the southwest, and while the importance of long views in general is recognised in the report, there is a loss of local distinctiveness in ignoring these.

Masterplan

The Masterplan section of the Design Code has been expanded:

- A section on green blue infrastructure is now included which shows strategic principles for green blue infrastructure, illustrating elements shown on the original masterplan and most recent masterplan.
- A new section on land use identifies a potential site for a new primary school, a new area of land is shown for a community carpark and public open space. No further detail is given about this, for example what form the POS would take or what number of cars are to be accommodated, or why the cars would be parked here. The proposed carparking area appears remote from other housing areas, requiring pedestrians to cross a main road to reach it, since there is no footpath on this side of the road, this would seem to be an unnecessarily dangerous proposal. This area of land has been identified as important in landscape terms in the Lives and Landscapes report (2015) as contributing to the sense of openness in the local community as it is at this point where one can appreciate the hills on either side of the Irwell Valley. It is currently open pasture and makes a strong contribution to the sense of Edenfield being a self contained community surrounded by open countryside. Development of this land even for carparking would reinforce the ribbon development here. A further consideration must be the setting of Elton Banks which is a listed building 50 m to the north.
- As I stated in my initial comments, (para 4.1.1) the relocation / expansion of the primary school would have landscape implications as any new development could extend into open country.
- A section on vehicular movement states that road alignments will be considered through further planning applications to work with the slope of the development sites, further guidance on how this might work should be included here, to demonstrate how the typical Settled Valleys settlement pattern might be retained. This section also suggests that views along internal streets should be aligned to distant hills where feasible. There is no mention views to important landmarks such as Peel Tower.

A section on off site highway improvements proposes a number of new features.

- The proposed area of community carparking at the entrance to the site off Market Street, utilising an area of important open space is inappropriate. This is an undesirable addition from a landscape perspective. The open field which fronts onto Market Street was partly retained in the original proposals allowing open views across the site towards hills opposite and southwards towards the Peel Monument and the tower of Emmanuel Church. This introduces a new area of hard standing in an area that was previously open meadow, further reducing the area available for rainwater absorption and meadow grassland. If additional carparking is required it should be moved further down the slope into the site and the site layout adjusted to accommodate it.
- A proposed raingarden is shown in one small area. While this is potentially a welcome element, features such as raingardens should be incorporated into the whole of the proposals as a policy for flood mitigation and biodiversity gain, and not 'dotted' into the scheme where there's a bit of space.
- Areas of aggregate chippings are proposed at key points. It states that the colour of the aggregate and exact detail to be agreed with the LA engineer at design stage. Surely the point of the Masterplan and Design Code is to set out what materials design are considered

appropriate so each developer doesn't come up with something different, and there is some sense of consistency! Similarly the images shown need further explanation describing what is shown.

The masterplan itself has been updated to show a more comprehensive network of cycle and pedestrian routes through the whole of the H66 allocation. There is still no recognition of long views from the site e.g. to Peel Tower and how these could be used to orientate vistas etc through the site.

There is some mention in the section on green blue infrastructure of the retention of some of the existing stone walls which are strong landscape elements running across the site, but it isn't clear that this includes both the walls bounding the existing public footpath and the wall running along the northern edge of the recreation area, which may be beyond the site boundary. Similarly, what is happening with the stone wall along the frontage to Market Street? This appears to be removed on drawings on page 47 to accommodate sight lines, yet in the visual analysis of the site, mention is made of this stone wall preventing views for vehicle users into the site. This is a very important aspect of this development, it is the entrance and the first view that people will get of the site, what it looks like and how it relates to Market Street is important. The triangular coping stone topped walls are a distinctive feature of Edenfield that should not be lost.

Site wide codes

- A more comprehensive list of appropriate planting has now been included. A minor point is that some of the shrubs listed are perennials and perhaps this list could be subtitled accordingly.
- A section on Suds is now included. Raingardens are mentioned briefly in respect of off site works earlier in the report, but no reference is made to them here, nor of the possibility of including them as wider features within the proposals. There is no mention of other Suds features such as permeable paving, water butts, green rooves, green walls: which could be a very useful way of treating retaining structures.
- The section on biodiversity is extremely brief and fails to use the opportunity to bring nature right into the development and provides little guidance to developers who may have little experience of habitat creation. My earlier comments still stand. Some habitat interventions are mentioned: hedgehog / small mammal gaps under boundaries / fences should be mentioned too.
- Play provision is well considered, there could be an overlap with biodiversity provision here.
- Movement: I am disappointed that the guidance on street tree planting has been diluted further. Previously the guidance was for a tree lined street, this has now been down-graded to 'Tree planting where appropriate' (and later with reference to T junctions 'tree' has been replaced with 'landscaping'). Appropriate to who? The developer? The homeowner? This needs to be strongly mandated and prescriptive. I note trees are now omitted from the junction design thumbnails: no leafy avenues here then?
- Access and parking typologies: My comments are as previously, I note bin stores and cycle parking to homes are not included. The use of formal hedges to separate parking bays where space is limited can provide useful green infrastructure.

Area Types

I note the character areas have been revised within the main H66 allocation. There is now recognition that taller building heights should not restrict long views, and single storey dwellings can be used to allow through views for instance at Edenfield North. Further guidance is given on the location of new homes in respect of the topography. It is acknowledged that where there are wider views of Edenfield from the west more sympathetic building materials should be used.

More specific guidance has been added on the location of building lines and reducing the visibility of parked cars so the street character in Edenfield Core is more compatible with that of Market Street. More detail is given for the expected landscape treatment for the fronts of homes, and materials are appropriately considered for boundary treatments.

Phasing

My concerns that footpath 126 through the site and the path side vegetation etc would be seriously affected by proposals to use it for emergency access still stand.

Conclusions

It is noted that several minor points that I noted in my earlier review have now been corrected. Sections on green blue infrastructure and improved pedestrian and cycle connectivity are welcome additions, and the Area Type information has been updated with greater detail. There are still areas where the Masterplan and Design Code fails to emphasise local distinctiveness and there is still an unwillingness to accept the rural context of Edenfield. Biodiversity is inadequately addressed and far more could be said to promote sustainable development from a landscape perspective.

The main area where the Masterplan and Design code still falls short is in the lack of any direction on soft landscaping and specifically tree planting within the proposed built-up area. I consider this means that the Design Code does not meet the requirements of policy H66 which requires landscape throughout the site.

PB 3rd August 2023

Representations against Planning Application 2022/0451 (as amended in June 2023) and the Revised Masterplan & Design Code for Land West of Market Street, Edenfield.

Summary of Points

Summary of Representations against Planning Application 2022/0451 (as amended in June 2023) and the Revised Masterplan & Design Code for Land West of Market Street, Edenfield.

1) Pages 8 Revised Masterplan & Design Code (RMPDC): Criterion 1: Masterplan with agreed programme of implementation and phasing: *Claim fully addressed*. However, not all Developers were involved and there is no clear phasing schedule. Plan should be refused. Refer to paragraph 1.1 in AGA's Representation Submission (AGA) for detail.

2) Page 8 RMPDC: Criterion 2: Masterplan with agreed Design Code: Claim *fully addressed.* Again *as* not all Developers or Stakeholders were involved, the Plan should be refused. Refer to (AGA) paragraph 1.2 for detail.

3) Page 8 RMPDC: A Transport Assessment (TA): 'TA provided demonstrating safe and suitable

access for all users'. Information submitted leaves key issues unresolved. Refer to (AGA) paragraph 34 and supporting sub-paragraphs. Plan should be refused.

4) Page 8 RMPDC: Criterion 5(v): Landscaping throughout the site to 'soften the impact of

development[']. Despite this issue being highlighted by RBC, RBC's Consultants and Residents it remains unresolved. Plans should be refused. Refer to (AGA) paragraph 1.4 for detail.

5) Page 14 RMPDC: NPPF 130: 'Sympathetic to Local Character including built environment'. Plan makes no effort to soften the impact to Alderwood Grove with a proposed housing density of 47.7 dph, house heights in excess of existing buildings and interface distance at least a metre below the minimum requirement. Plan should be refused. Refer to (AGA) paragraph 2.1 for details.

6) Page 14 RMPDC: NPPF 134: 'Development that is not well designed should be refused'. Not sympathetic to surrounding built environment and poor site layout design in terms of excessive density, height and massing/interface distance. Plan should be refused. Refer to (AGA) paragraph 2.2 for detail.

7) Page 14 RMPDC: Section 15 of NPPF: 'protecting and enhancing valued landscapes'. Makes no effort to retain the key long views. Refer to (AGA) paragraph 2.3 for detail.

8) Page 14 RMPDC: Third Column: Claim '*proposals consistently follow the principles set out in the NPPF*': Clearly not the case if you refer to paragraphs 5 to 7 above. Plan should be refused.

9) Page 15 RMPDC: Claim 'that the proposed development of the site accords with the NPPG'. With the excessive density, proposed plot heights, massing and the interface distance being below the minimum required this plan cannot be considered to accord with the NPPG. Plan should be refused. Refer to (AGA) paragraph 3.

10) Page 16 RMPDC: Local Planning Policy: H66: The revised plan does not meet either Criterion 1 or 2. Plan should be refused. Refer to (AGA) paragraphs 1.1 & 1.2 and (AGA) paragraph 4.

11) Page 18 RMPDC: Edenfield Neighbourhood Plan: 'Only limited weight given to this plan'. As representatives from Taylor Wimpey attended a presentation of the AECOM Design Code in Manchester on 9th March 2020 they can hardly claim to be unaware of it prior to 2023. The RMPDC postdates the AECOM Design Code. The AECOM Design Code should be adopted as the Design Code for this plan. Refer to (AGA) paragraph 5.

12) Page 19 RMPDC: Well Designed Place Circle: '*Enhances the surroundings*'. Comment raises questions about the judgement of Randall Thorp. Refer to (AGA) paragraph 6.

13) Page 26 RMPDC: Visual Context- Photograph and text downplay importance of view. Replace photo in the RMPDC. Refer to (AGA) paragraph 7.

14) Page 38: Column 2: Residential Amenity: 'Proposed development must ensure that residential amenity of existing dwellings is protected'.

No protection proposed for Alderwood Grove residents despite the issues of density, height, massing and interface distance. Plan should be refused. Refer to (AGA) paragraph 8.

15) Page 38: Column 3 Final paragraph: Relationship to open space: *Development should broadly seek to retain and frame views to the wider landscape context to retain sense of place.* The plan does not achieve this goal, particularly with respect to the existing properties in Alderwood Grove. Plan should be refused. Refer to (AGA) paragraph 9.

16) Page 44: Masterplan: Density: *Developers have increased the density in the Village Streets Area to 35-40.* This is completely unjustified, it is in conflict with the Head of Planning and Building Control's recommendation - *Density could be reduced to the Edenfield Core level and reduced even further in front of existing properties.* **Density needs to be reduced**. Refer to (AGA) paragraph 10.

17) Page 47: Offsite Highway Improvements: Information submitted leaves key issues unresolved. Refer to (AGA) paragraph 34 and its supporting sub-paragraphs. Plan should be refused.

18) Page **50:** Landscape-led Masterplan: '*Preserve and enhance what is already there*'. The RMPDC is clearly not complying with this. Plan should be refused. Refer to (AGA) paragraph 12.

19) Page 54: Phasing: Randall Thorp state 'ordering of development phases may be varied or delivered simultaneously'. This is contrary to Phasing Policy for H66, it is unacceptable and could lead to total chaos. Plan should be refused. Refer to (AGA) paragraph 13.

20) Page 60: Site Wide Codes: Nature: 'Development should safeguard and enhance the natural environment and biodiversity and positively contribute to the well-being of people.' There is no way this plan contributes to the 'well-being' of people in Alderwood Grove and Market Street. Reject the Plan. Refer to (AGA) paragraph 15.

21) Page 76: Site Wide Codes: Built Form: Paragraph 1: 'Density, massing, height, materials, orientation and spacing etc': This plan does not provide an appropriate response to any of the issues or provide a strong sense of place to residents of Alderwood Grove. Additionally, in its current format it does not comply with building regulations. Plan should be refused. Refer to (AGA) paragraph 16.

22) Page 76: Site Wide Codes: Built Form Paragraph 2, sixth bulleet: 'Variation in ridge height and roof pitch': Lower ridge heights need to be introduced to the proposed plots in front of numbers 5 to 8 Alderwood Grove. Refer to (AGA) paragraph 17.

23) Page 76: Site Wide Codes: Column 3: BF 01: 'Unless otherwise justified follow guidance set out in Area Type as set out in the Design Code'. As the Area Types or Design codes have not been agreed the plans should be refused. Refer to (AGA) paragraphs 15 to 17 and (AGA) paragraphs 21 to 28.

24) Page 84: Area Types: Village Streets: AT/VS 01: Density: Originally 29dph, with very little justification the Developers increased this to 35-40 dph. (Actual density behind 5 Alderwood Grove is 47.7 dph.) Plans should be refused. Developers must reduce the density proposed. Refer to (AGA) paragraph 21.

25) Page 84: Area Types: Village Streets: AT/VS 03: Massing: 'Identified less sensitive locations to increase the density'. Edenfield Parish Church and its grounds, Alderwood Grove and Alderwood cannot be described as 'a less sensitive area'; the plan for Alderwood Grove proposes a density of 47.7 dph, properties that are too high and interface distances below the minimum legal requirement. Plan should be refused. Refer to (AGA) paragraph 22.

26) Page 84: Area Types: Village Streets: AT/VS 04: Height: *Plan proposes house heights greater than those of the existing homes that are directly behind creating a "blank wall effect".* Plan should be rejected until proposed heights are reduced to retain key long views and minimise the degradation of existing homes. Refer to (AGA) paragraph 23.

27) Page 84: Area Types: Village Streets: AT/VS 05: Building line / Set back: 'Strong block culture will complement the character of nearby Market Street'. The layout in no way complements Market Street. Plan should be refused. Refer to (AGA) paragraph 24.

28) Page 84: Area Types: Village Streets: AT/VS 07: Front Boundary Treatments. There is no clear boundary treatment plan and the use of Red brick is not sympathetic with the Market Street context. Plan should be refused. Refer to (AGA) paragraph 25.

29) Page 84: Area Types: Village Streets: AT/VS 08: Key Views: '*Quality of views to and from Recreation Ground'*. Evades vital issue of views to/from Church, plan should be refused. Refer to (AGA) paragraph 26.

30) Page 88: Area Types Edenfield North: AT/EN 01 Density: 'Lower density than Edenfield Core to reflect the position at the northern fringe of Edenfield' Statement is incorrect. Refer to (AGA) paragraph 27.

31) Page 88: Edenfield North: AT/EN 04: Height: 'Retention of Key Long Views: Select building heights to ensure long views to distant hill tops are retained'. This policy should apply equally to the northerly section of Village Streets. Refuse the plan until this policy is universally adopted. Refer to (AGA) paragraph 28.

32) Page 96: Design Quality Checks: For comments on all five of these checks refer to (AGA) paragraphs 29 to 33. The plan should be refused until the Developers address the issues highlighted.

33) Page 100: Column 1 Paragraph 2; Transport Assessment Summary: Refer to (AGA) paragraph 34 and its sub paragraphs. Plan should be refused.

Representations against Planning Application 2022/0451 (as amended in June 2023) and the Revised Masterplan & Design Code for Land West of Market Street, Edenfield.

Representations

1) Pages 8-9: Executive Summary: Policy H66: *Development for approximately 400 houses would be supported provided that:*

1.1) Criterion number 1: Comprehensive development is demonstrated through a Masterplan with agreed programme of implementation and phasing.

Claim: Fully addressed within this document (Masterplan included in section 02/page 51, phasing and implementation in section 03.)

This claim cannot be justified as 'comprehensive' as not all of the Developers were involved and there is no agreed phasing schedule.

1.2) Criterion number 2: Development is implemented in accordance with an agreed design code. Claim: Fully addressed within this document (Sections 04 and 05, and Appendix A). Again there are no grounds for this claim when not all of the Developers and Stakeholders were involved and the Plan is in conflict with Building Regulations. Refer to (AGA) paragraph 2.1.2.

1.3) Criterion number 3: A Transport Assessment (TA) is provided demonstrating safe and suitable access for all users, including . . .

Detailed TA has been submitted with the Taylor Wimpey (TW) Phase 1 application, including a cumulative analysis for the full allocation (as summarised in Appendix C), to be refined through subsequent individual planning applications.

The Revised Masterplan cannot possibly be considered until a further **comprehensive** study covering all the outstanding traffic issues is addressed as it is most likely that the outcome will require the quantum of development to be reduced as per LCC's original comments. Refer to (AGA) paragraph 34 below and its sub-paragraphs. Masterplan should be refused.

1.4) Criterion 5 (v): Landscaping throughout the site to 'soften' the impact of the development and provide a buffer to the new Green Belt boundary.

The Masterplan includes a substantial buffer along the western boundary to include landscape structure planting, with detail to be refined/agreed through individual planning applications.

The Masterplan makes no effort to cover "*softening the impact of the development*" and ignores the requirement for "*landscaping throughout the site*"; specifically with respect to the houses in

Alderwood Grove that face onto the development. Again the Developers just try to 'kick the can down the road' and continue to ignore this requirement.

2) Context Page 14. National Planning Policy:

2.1) Paragraph referring to NPPF Paragraph 130: Bullet point 3 states: "Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

2.1.1) The increase in density proposed for the Village Streets is against all logic for a development involving mainly semi-detached and detached houses, particularly when the Head of Planning and Building Control suggested lower densities could be created near the main entrance and existing buildings. Refer to page 10 of RBC's letter dated 18.05.23 addressed to Mr. Graham Lamb. In the northerly section of Village Streets area there are only two terraces being built, one for 4 homes and the other for 3 homes and these are directly behind the detached properties in

Alderwood Grove. This northerly section of Village Streets should be reclassified as Edenfield Core and the density reduced to the 26-30dph. Refer to (AGA) paragraph 10 below.

The proposed increase in density will have an adverse effect on views to and from Edenfield Parish Church and Grounds which is a Grade 2* Listed Building with parts of the Tower dating back to 1614. In my case (5 Alderwood Grove) there are to be six + houses built directly behind my property with a density of 47.7 dwellings per hectare.

2.1.2) The current Interface Distance Plan number 409469 is inaccurate; the line added to the original plan for number 5 Alderwood Grove does not fully reflect the significant additions made to the original house.

Basically the proposed layout is too close as the Patio Door and the Bedroom window in plot 5 are only 20 metres from one of the windows in the Sun Room of 5 Alderwood Grove.

The 47.7 dph density and the closeness of the proposed properties cannot be acceptable in any circumstances.

2.1.3) In addition plot numbers 6 and 7 are higher than 5 Alderwood Grove (AG); they are directly behind the Lounge, Dining Room, Utility, Master Bedroom and Guest Bedroom and will block light and views as well as removing all our privacy and damaging our well-being.

These issues were raised in my response to the previous consultation and the only change that has been made is to replace a detached and a pair of semi detached houses with a terraced block of 4. Additionally, the change in house type proposed in the revised plan to terraced for plots 2 to 5 will have a significant effect on the extensive views from Market Street which were highlighted by Penny Bennett the Landscape Architects employed by RBC in the latest report dated 11.05.23 as well as in all their previous reports. The use of terraced houses in this area means that plot number 4 is now

significantly higher than it was before and there are no gaps for 'glimpsed views' between the properties.

2.1.4) The Penny Bennett Review dated 11.05.23, on page 6 paragraph 4.1.9 ninth bullet point, refers to the comment in the Masterplan 'where the H66 allocation adjoins Market Street, development must not fully obscure views to the high land to the west of Edenfield' as **too weak and needs to be more specific.**

Also in that Review, page 8 Section 4.3 Identity, the second bullet point refers to retaining the long views and keeping development low as follows: '*This is* **most important** in the vicinity of Mushroom House near the proposed road entrance where buildings to this frontage could be lower to allow views over.'

They also recommend "further consideration be given to the use of single or 1.5 storey buildings where views are to be retained" yet the Developers ignore all this and propose a blank row of high terraced houses.

There is further reference to this in the second bullet on page 9 - "terraced housing . . . would block views westwards, conflicting with the principle to retain long views westward".

In view of these issues the plan is not "sympathetic to local character and history, including the surrounding built environment and landscape setting," and must be refused in its current format. All of these issues can be remedied by reducing the density, lowering the finished floor levels by a minimum of three metres or changing house types, moving the houses further west from the eastern boundary to comply with building regulations and by returning the field to its original topography through the removal of the man-made mound. It is ridiculous to see Developers claiming to be producing a High Quality Plan when they are proposing building at below the minimum Interface distances allowed.

2.2) NPPF: Paragraph 134 emphasises that 'development that is not well designed should be refused' The revised Plan is not sympathetic to the surrounding built environment or existing residents, it is very poorly designed, it is in conflict with Building Regulations and therefore should be refused.

Refer to comments above in (AGA) paragraph 2.1 under NPPF 130 which indicate the poor site layout design in terms of excessive housing density and height and (AGA) sub-paragraph 2.1.2 with respect to its Interface distance defects.

2.3) Section 15 of the NPPF, Conserving and Enhancing the Natural Environment, (paragraph 174) "sets out how planning policies and decisions should contribute to and enhance the natural and local environment by:

• Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). Again this Masterplan does not protect or enhance the Valued Landscape as it makes no effort to retain the long views highlighted above.

2.4) Third Column-first paragraph claims: *"The Masterplan proposals presented within this document consistently follow the principles set out in the NPPF"*

From the points we have highlighted throughout our submission to the previous Consultation and the points made in (AGA) paragraphs 1.1 to 1.4 and (AGA) paragraphs 2.1 to 2.3 it is clear the claim that it follows the principles set out in the NPPF is incorrect and cannot be justified.

3) Page 15 States: "Guidance is given on how buildings and the spaces between buildings should be considered. In terms of layout, developments should promote connections with the **existing routes and buildings**, whilst providing a clear distinction of public and private space. Care should be taken to design the right form for the right place, but the extent to which this is achieved can depend on architectural and design quality. It is considered that the proposed development of this site accords with the NPPG."

How anyone can make a statement like this beggars belief when directly behind 5 AG the proposed housing density is 47.7 dph, the houses on plots 6 and 7 are higher than 5 AG and the Interface distance between plot 5 and 5 AG is below the minimum requirement. The result of these deficiencies will be dramatically reduced daylight, loss of privacy, loss of views across the valley and significant damage to residents' well-being.

The statement that this Plan accords with national guidance is clearly not factually based and again it brings into question the validity of any comment made by the Developers or their Agents.

4) Page 16: Policy H66 states: *Development for approximately 400 houses would be supported provided that:*

1. The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing;

2. The development is implemented in accordance with an agreed design code.

Refer to (AGA) paragraphs 1.1 and 1.2: Criteria Numbers 1 and 2: In view of the comments made under this reference this revised planning application must be refused.

5) Page 18: Context Column 1 third Paragraph: "Given this conflict with the Local Plan, the early stage of the document, and the fact it postdates the submission of this Masterplan & Design Code it has only been given limited weight."

Randall Thorp are either not aware or deliberately not quoting all the facts in an effort to avoid Taylor Wimpey's having to comply with the Design Code prepared by AECOM for the Edenfield Community Neighbourhood Forum despite representatives from Taylor Wimpey being introduced to the AECOM Design Code at a presentation in Manchester as long ago as 9th March 2020. Furthermore it is Randall Thorp's Masterplan/Design Code, dated June 2023, that postdates the

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Neighbourhood Plan and AECOM Design Code, which were subject to a Regulation 14 consultation that closed in April 2023.

ECNF's AECOM-produced Design Code is far superior and should be preferred to the one from Randall Thorp.

6) Page 19: In the Well Designed Place Circle under context it states: "Enhances the surroundings."

How Randall Thorp could possibly claim this Development enhances the surroundings must raise further questions over their judgement and the rest of their submission.

7) Visual Context: Page 26: The Masterplan downplays the importance of the views. If the top photograph had been taken from the opposite footway on Market Street, it would have shown much more clearly how extensive the view is.

No regard is paid to the value of the view for pedestrians and horse-riders. It is untrue that, as stated, "*The wall generally screens views of the site itself from passing vehicles*". The view from vehicles depends on the viewer's position and the height of their seat (e.g., van, HGV, upper saloon of bus).

8) Page 38: Context: Column 2 Final Paragraph: Residential Amenity States "Existing housing both backs and fronts towards the site at various locations along the eastern site boundary. Proposed development must ensure that residential amenity of existing dwellings is protected."

Despite reference to the eastern boundary's existing dwellings there are no mitigation measures included that cover this and no protection proposed for the existing dwellings in Alderwood Grove.

The density of the proposed houses behind number 5 Alderwood Grove is 47.7 dph leading to appalling massing/ cramming. The proposed dwellings on plots 6 and 7 are higher than 5 Alderwood Grove and the interface distance is below the minimum building regulation requirement. **From the comments above it is clear the residential amenity of existing dwellings is not being protected and the Plan should be refused in its current form.**

9) Page 38: Context: Column 3: Relationship to open space and context: Final Paragraph: "Development should broadly seek to retain and frame views to the wider landscape context to retain sense of place. The locations of retained views should be demonstrated as part of each subsequent planning application."

Under the revised Plan the Key View west from Market Street will be significantly obscured and the "*sense of place*" for the Residents generally will be reduced and for residents of Alderwood Grove it will virtually disappear.

The Masterplan should be refused in its current format.

10) Page 44: Masterplan: "The Masterplan indicates a residential net developable area of 12.6 hectares. Delivery of 400 dwellings across the allocation site equates to an overall development density of 32 dwellings per hectare."

Despite what the Developers state above the reality is that the Local Plan approving the release of this site (H66) from the Green Belt contemplated a density of 29 dph.

The Developers appear to have adjusted the figures to suit their requirements which surely cannot be acceptable, particularly when not all the Developers have contributed to this revised plan.

Area	Land Owner	Property Type	Density Proposed
Edenfield Core	T. Wimpey	Detached and Semi Detached	26 to 30
Village Streets	T. Wimpey	Mainly Detached and Semi Detached	35 to 40
Chatterton South	Methodist Church	Terraced	36 to 45
Edenfield North	Peel LP		30-34
	R. Nuttall	Terraced	

As the original site density was calculated at 29 dph when the land was approved for removal from the Green Belt, how can it now be acceptable to change every area other than Edenfield Core? The division of the field between Mushroom House and the Old Vicarage into Edenfield Core and Village Streets does not make any sense at all particularly when the Northerly section has been identified as a Key View Area both from Market Street and Edenfield Parish Church. It is incredible that the Developers would increase the density close to Edenfield Parish Church which is Grade 2*-listed when they were requested to ensure views to and from the Church and Grounds should be retained.

The property type in the Northerly section of Village Streets is effectively the same as Edenfield Core being predominantly detached and semi-detached with only two token small terraces.

We can only assume the two small terraces have been introduced in the revised planning application to enable the Developer to divide this field into two Area Types and thereby take advantage of the higher density they can achieve by changing the northerly section from 26/30 to 35/40. (A sleight of hand increase of 34%)

RBC should ensure that neither of the two sections of Village Streets nor Edenfield Core has a density of more than 26-30dph.

The Developers have made this change despite the Head of Planning and Building Control suggesting lower densities could be created near the main entrance and existing buildings in the same area. Refer to letter from RBC to Mr. Graham Lamb dated 18.05.23.

No consideration whatsoever is given to the serious adverse effect it will have on views to and from the Church, and on existing residents, particularly those in Alderwood Grove and specifically Number 5.

There surely is no way this Masterplan can be approved with unacceptable levels of housing density that are significantly higher than those in the Local Plan.

11) Page 47: Offsite highway improvements: Refer to (AGA) paragraph 34 and its sub-paragraphs. Masterplan should be rejected.

12) Page 50: A LANDSCAPE-LED MASTERPLAN: Column 1 Paragraph 3: "Retention of existing landscape features helps to create a unique scheme that is responsive to the site, preserves and enhances the best of what is already there, and knits it into the wider setting, providing the foundation for a strong sense of place and local character."

Several responses to the previous consultation highlighted the fact that the simplest way to retain the maximum of the existing landscape was to remove the man-made mound in the field between Mushroom House and the Vicarage. This along with a reduction in the same field's height of a minimum of three metres or a change of housing design along the eastern edge boundary, adjacent to Alderwood Grove and Alderwood would significantly contribute to retaining and preserving the existing landscape features for existing and new residents.

Additionally, it would make a significant contribution to resolving the Market Street Key View issue highlighted by Penny Bennett Landscape Architects in all their reports.

The Developers also appear to have disregarded the comments made with respect to "Everything leading from the Key Landscapes" by Places Matter in their report dated 25th March 2023 on page 3 in paragraph 3.

The Head of Planning and Building Control in his letter to Mr. Graham Lamb dated 18.05.23 on page 10 comments in bullet point 3 that 'visual objectives need to be included'; in bullet point 7 he states 'the design of the dwellings require alteration and significant upgrade to reflect the character of the area'; in bullet point 12 he states 'need to be thinking in a 3 dimensional way to eliminate poor views and allow views of key vantage points' and in bullet point 16 - he states 'development should take into account the landscape typologies of the area'.

We can only conclude that none of these suggestions was to the liking of the Developers despite the man-made mound spoil having a value, so once again they ignore this opportunity to compromise and plough on with their minimal expense approach despite the advice given and the 'well-being cost' to existing residents.

It is almost inconceivable that the Developers could claim that they are 'preserving and enhancing' the existing landscape features when in reality they are just ignoring their responsibility for the scheme to reflect the local area and recognise the rural character of the site and wider area.

Until the Developers recognise the problems and work towards a compromise the Masterplan should continue to be rejected.

13) Page 54: PHASING: "The masterplan demonstrates the independent nature of each developer's landholding, ensuring that each parcel can be delivered independently without prejudicing any other. As a result, the ordering of development phases may be varied or delivered simultaneously."

This statement is unbelievable; it lacks any credibility at all. It does not comply with the Policy for Phasing for H66 as it does not provide for any programme of implementation at all. The comment that the phases could be delivered simultaneously has obviously not been considered seriously or with any regard to the traffic chaos and pollution that concurrent developments would cause. Therefore the Masterplan should be refused.

14) Page 58: Site Wide Codes: Column 3: Identity: IDENTITY: "Development should create a distinctive new place that complements and enhances the character of Edenfield by drawing upon the baseline analysis as presented within this Code. Refer to Area Types for detailed guidance."

Please refer to (AGA) paragraphs 21 to 28 for comments relating to the specific issues covered in Area Types and note that the plan fails to complement and enhance the character of Edenfield.

15) Page 60: Site Wide Codes: Nature: Column 1 Paragraph 1: "Development should safeguard and enhance the natural environment and biodiversity and positively contribute to the well-being of people."

There is no way that this development in its present format positively contributes to the 'well-being' of people who reside in Alderwood Grove and Market Street whose loss of privacy, light and views as well as their well-being has been completely ignored.

16) Page 76: Site Wide Codes: Built Form: Column 2: General built form & urban design principles: Paragraph 1: "Changes in built form in terms of: block structure, density, massing, height, materials, building orientation, spacing between buildings and building set back from highways should combine to create variety and place appropriate responses ensure the scheme has a variety of character areas and strong sense of place."

Whilst this is a Site Wide Code it has not been adopted in the Plan for the proposed housing behind numbers 5 to 8 Alderwood Grove as the response provided particularly in terms of density, massing, spacing, interface distances and height **could in no way be considered to be appropriate.**

17) Page 76: Site Wide Codes: Built Form: Column 2: General built form & urban design principles: Penultimate bullet: "Variations in ridge height and roof pitch across the site should be utilised to create an interesting roofscape."

The lower ridge heights referred to should be introduced behind existing properties particularly those in Alderwood Grove to minimise the loss of privacy, light, views and well-being of the residents and improve the retention of the key Long Views from Market Street for all village residents.

18) Page 76: Site Wide Codes: Column 3: BF 01: "Unless otherwise justified, development should follow the Area Type guidance as set out in the Design Code."

All of the Site Wide Codes comments made in (AGA) paragraphs 15 to 17 as well as the Area Type Identity comments in (AGA) paragraphs 21 to 28 need to be enforced rather than allowing them to be ignored.

19) Page **77:** HOMES AND BUILDINGS: *"Development should provide well designed homes which address space standards, accessibility, adaptability, lighting, privacy, security and the delineation of public and private spaces."*

The development of new homes should minimise any loss of light, privacy, and security to existing properties and this must be emphasised before any planning decision is finalised.

20) Page 77: HOMES AND BUILDINGS: HB 02: "All homes should be designed to maximise internal daylight, spacing and have appropriate privacy distances in accordance with Local Plan policies."

HB 02 should also ensure that the daylight, spacing, interface distance and privacy **of existing properties and residents are not compromised** by the development.

For this to be achieved plots 1 to 13 should be moved away from the eastern boundary, built with lower roof ridge levels at a reduced density and with greater interface distances.

21) Page 84: Area Types: Village Streets: AT/VS 01: Density: The original density in the Local Plan for the entire site was 29dph. The Design Code seeks with spurious reasoning to increase this to 35-40dph, which is more appropriate to areas close to the Town Centre. Refer to (AGA) paragraph 10 for the comparison of Area Type Densities and the lack of any justification for the changes. We have checked the area behind numbers 5 -8 Alderwood Grove from the Levels Strategy Sheet 1-409445 and the Interface Distance Plan 409469 carefully and calculate from the boundary of plot 2 to the boundary of plot 12 the density is 45.7 dph.
We have also checked the area behind the boundary of 5 Alderwood Grove, calculating from the boundary of plot 2 to plot 7 and the density in this section is 47.7 dph.

Note once again that this is despite the Head of Planning and Building Control suggesting lower densities could be created near the main entrance and existing buildings. Refer to page 10 of RBC's letter dated 18.05.23 addressed to Mr. Graham Lamb.

The change in density proposed for the northerly section of Village Streets will have a very negative effect on the views to and from Edenfield Parish Church and Grounds, a Grade 2*-listed building.

Additionally, this high density creates a blank wall effect behind 5 AG as the proposed houses on plots 6 and 7 are higher than 5 AG and are directly behind our Lounge, Dining Room, Utility, Master Bedroom and Guest Room. Additionally, plots 2 to 5 which are of a similar height will dramatically reduce the light, privacy and views from our Sun Room.

The housing density behind the existing properties in Alderwood Grove and close to Edenfield Parish Church and Churchyard must be significantly reduced by reclassifying the area as Edenfield Core before the plan is considered for approval.

22) Page 84: Area Types: Village Streets: AT/VS 03: Massing: Semi detached, detached and terraces. Housing areas which sit internally to the central housing parcel, in less sensitive locations, have potential to be delivered at higher densities which can be achieved by incorporating terraces which are typical of the area.

The massing leaves virtually no gaps in the new builds behind the existing properties in Alderwood Grove. This was highlighted in many of the submissions made on the previous Consultation on the planning application. Note we refer again to the density of 47.7 dph and the overbearing height of the new builds.

Additionally, the Interface Distance between 5 AG and the proposed dwelling on Plot 5 is below the minimum requirement in what is claimed to be a 'High Quality Development'.

Surely if it were a 'High Quality Development' the Interface Distance would be considerably higher than the minimum allowed.

Note the key issue here is the 'less sensitive locations' which cannot possibly apply to the existing properties in Alderwood Grove or the Grade 2*-listed Edenfield Parish Church and its grounds. The density should be reduced as highlighted in (AGA) paragraph 21 with the Area Type being reclassified as Edenfield Core, the roof ridge heights of the new build homes should be at the very minimum three metres lower and the development should be moved westwards to increase the Interface Distance.

The first whole paragraph on page 6 of the Places Matter report dated 25.03.23 refers to a "sense of sprawl and sense of 'nowhere development'" and recommends the developers seek "to create distinctive places resonating what is quirky/unique about Edenfield e.g., create smaller pockets of development, broken up by landscape".

The proposed layout behind Alderwood Grove would appear to be a good example of the "sense of a nowhere development".

23) Page 84: Area Types: Village Streets: AT/VS 04 Height: Key characteristics: *2 storey, up to 10% 2.5 storey where appropriateness can be demonstrated.*

Housing will be situated on land at a lower level than Market Street. Appropriately located 2.5 storey development can add interest to the roofscape and street scene at this central village location.

We referred to the 'Blank Wall Effect' behind our property number 5 Alderwood Grove in our submission to the previous consultation but it would appear that the Developers have again just disregarded the comments as they appear to have done with virtually all the other objections.

The heights of the proposed houses on plots 2 to 12 are unacceptable and unnecessary and critical for the residents in Alderwood Grove and Market Street. The Developers should reduce the housing density behind Alderwood Grove and either lower the finished floor levels and roof ridge heights at plots 1 to 13 or introduce single or 1.5 storey buildings in this area. Refer also to (AGA) paragraphs 21 and 22.

The use of 1.5 storey buildings recommended by PBLA in their report dated 11.05.23 on page 8 in bullet point 2 should be adopted adjacent to Alderwood Grove.

The revised plan should be rejected unless the Developers take into account existing residents' opinions, the comments made by RBC's Consultants and its Head of Planning and Building Control with respect to retention of the key long distance views.

There are two references in the Places Matter report dated 25.03.23, in the last paragraph on page 5 and on page 7 in the final paragraph, to the potential impact of topography on the site, which highlight it is an issue and they comment that the Developers **are missing part of its charm**.

There is also a reference to the site's topography in the letter from the Head of Planning and Building Control to Mr. Graham Lamb dated 18.05.23 in bullet point 16 on page 10 advising the developers to take into account the landscape typologies of the area.

The proposals made by several responders to the previous consultation to return the field to its original topography would go a long way to solving this issue and at the same time improve the overall layout of the site.

24) Page 84: Area Types Village Streets: AT/VS 05 *"Building line/set back: Strong building line with variation in set back used to vary frontage and side parking arrangements. A strong block culture will complement the character of nearby Market Street and will enable a variety of parking solutions."*

The proposed layout for this development cannot in any way, shape or form be described as complementing the character of nearby Market Street in terms of housing density, quality of materials used etc.

25) Page 84: Area Types: Village Streets: AT/VS 07: Front Boundary Treatments: *"Hedgerows, shrub planting, grass, red brick masonry walls.*

To provide consistency with building materials and allow greater perception of change in character through the central land parcel.

It is still unclear what additional boundary treatment other than the existing dry stone wall will be provided to 'soften' the impact of this development for residents in Alderwood Grove as they show trees/hedgerows in the Detailed Layout Colour 409463 but not in any other document.

The use of red brick as the building material **(AT/VS 06)** and for the walls is unsympathetic with the adjacent built environment of Market Street.

Until the boundary details are clarified and the residents have the opportunity to comment further any approval should be withheld.

26) Page 84: Area Types: Village Streets: AT/VS 08: Key views to be considered. "Quality of views to and from recreation ground.

Ensure development provides a characterful and attractive elevation to the interface with Edenfield Recreation ground'''

This is a further example of the Developers/Agents trying to 'muddy the water' and steer attention away from one of the most important views identified by RBC's Consultants, Penny Bennett Landscape Architects(PBLA), and commented on in all their reports.

It must be no surprise to the Developers that there are two areas called Village Streets and only one of them is close to the Recreation Ground.

To clarify, the northerly Village Streets enjoys the view highlighted by PBLA and not the Recreation Ground and this area should be reclassified as Edenfield Core to protect the Key Views and the Grade 2*-listed Edenfield Parish Church and its grounds.

The change to Edenfield Core would mean that the 'Key views to be considered' would then also include *"Distant hilltops from Market Street and PROW.* **These are locally valued and provide sense of place."**

There was never a truer statement than 'locally valued and provision of a sense of place'. Alderwood Grove and Market Street residents along with others under the original plan lost access to virtually all the views and despite this being highlighted in many of the Objections the Developers just disregarded them.

Unfortunately, in the revised plan the situation has deteriorated, with the substitution of terraced housing for plots 2 to 5 and 10 to 12, meaning even more of the view will be lost to residents in Market Street, pedestrians / travellers on the main road and footpaths as well as the residents in Alderwood Grove.

It is interesting to note that the Places Matter Report dated 25.03.23 highlights that the Developers and their Agents should have paid more attention to Key Views. They commented "You must keep 'glimpsed views' to the countryside" on both page 2 paragraph 3 and page 5 paragraph 5 and said on page 3 paragraph 3 that everything should lead from key landscapes. (There are no glimpsed views from a row of terraced houses.)

Approval should be withheld until the Developers pay more attention to the Key/Glimpsed Views and modify their proposals in terms of housing densities and ridge heights to achieve this goal.

27) Page 88: Area Types: Edenfield North: AT/EN 01 Density: *"Lower density than Edenfield Core to reflect position at northern fringe of Edenfield."*

This statement is **incorrect**; the density for Edenfield Core is stated to be 26-30dph whilst Edenfield North is 30-34dph.

Clarification is required to determine which figure is correct, the one quoted for Edenfield Core or the one for Edenfield North. This is important for existing residents.

28) Page 88: Area Types: Edenfield North: AT/EN 04: Height : The Key Characteristics Column states: *"2 storey. Up to 10% 2.5 storey and 1 storey where appropriateness can be demonstrated."* The Reasoning and influences column states: *"Building heights should be selected to ensure long views to distant hill tops are retained from Fingerpost Triangle on Blackburn Road. Variation in building heights should be used to create dynamic corners and characterful vistas."*

This policy with 1 storey homes should also apply to the area along the eastern edge from Mushroom House to Edenfield Parish Church, including Alderwood Grove, to ensure the important views identified by Penny Bennett from Market Street are retained for all to enjoy.

29) Page 96: Design Quality Checklist:

Number 1: "*How do the proposals architecturally reflect and complement the positive characteristics of Edenfield?*"

Not enough thought and care has been given to the homes of existing residents. Their privacy, space and well-being have been ignored resulting in their properties being downgraded under these proposals.

Generally, due to the enormous changes being proposed in Edenfield, houses in the village are being put up for sale and specifically in Alderwood Grove where half of the existing homeowners are proposing to relocate from what was once a proud and prestigious development.

30) Number 2: "How do the proposals positively contribute to the characterful and varied grain of Edenfield village?"

I am unable to find any way in which they make a positive contribution, if the homes had been built on the brownfield sites the Edenfield Community Neighbourhood Forum spent time and effort to identify and highlight to the Planners, many positive contributions would have occurred.

31) Number **3**: "How do the proposals respond to the existing public footpath network, and how do they support connectivity to local facilities and amenities?"

As the Developers accept, Edenfield already has a good footpath network and connectivity.

32) Number 4: "How do the proposals enable appreciation of locally valued buildings located throughout the site and the wider context?"

The development will adversely affect the views from the Grade 2*-listed Edenfield Parish Church and churchyard which are comforting when visiting and paying respects to relatives and close friends who are buried there.

There is also a strong possibility the housing number at Chatterton Hey could increase from 70 to 105 if the maximum figure in the density range quoted in AT/CS 01 of 45 dph is adopted for the 2.32ha noted in SHLAA 16263. This will devalue this heritage asset even more.

In view of these comments how could anyone appreciate the way the locally valued buildings are being treated?

33) Number 5: "How do the proposals demonstrate a landscape led approach and deliver high quality Public Realm, Public Open Space, Green Infrastructure and Biodiversity Net Gain?"

The critical comments From the Places Matter report dated 25.03.23 highlight the fact that the Developers are "missing a regulating plan of the 'key moves' or 'must haves' that includes the key landscape and movement design strategies. Everything should lead from that" - page 3 paragraph 3.

The letter from the Head of Planning and Building Control to Mr. Graham Lamb dated 18.05.23 (page 9 bullet point 6) states "the scheme does not reflect the local area, nor does it recognise the rural character of the site and wider area"; page 10 bullet point 5 states 'this is a monotonous development'; page 10 bullet point 15 states 'landscaping and open space needs to be incorporated into and throughout the development area' and page 10 bullet point 16 states 'development should take into account the landscape typologies of the area'.

As only minimal changes have been made to the revised plan it is difficult to see how anyone will consider the approach of the plan to be landscape-led. The reference to 'delivering a high quality Public Realm' lacks any credibility when houses are being built at town centre levels of density and below the minimum Interface Distance allowed.

The comments made with respect to the failure to deal with the issues relating to the existing buildings in Alderwood Grove also confirm the lack of a landscape-led approach

If the Developers had truly wanted their proposal to deliver a 'high quality public realm etc' they would have reduced the height of the field between Mushroom House and Edenfield Parish Church to a more acceptable level thus maintaining key views, privacy, light and well-being etc. for existing village residents and visitors to the Church instead of just disregarding their opinions.

34) Page 100: Column 1: Paragraph 2: Transport Assessment Summary: Highways consideration of Masterplan: 'Turning count and parking surveys were undertaken in April 2023 on the local highway network. The surveys reveal that traffic levels have reduced compared to pre-pandemic levels, and which formed the evidence base at the time of the preparation of the Local Plan.'

The Transport Assessment Summary looks to be short-term thinking based on the claim that traffic volumes have reduced compared to pre-pandemic levels when people were working from home although the survey was only taken for a short period.

However, working patterns are changing again now with major companies requiring their staff to return to the office for several days per week and a further extended study for a minimum period of one week needs to be undertaken before this conclusion is accepted.

When you examine closely the comments surrounding the area close to the entrance to the Edenfield Core section, the plan appears to be extremely questionable, with footways 1 and 2 metres wide, car parking of 2 metres on the eastern edge as well as three running lanes of traffic, it does not appear feasible when the number of buses and heavy goods vehicles that use this main route are factored in.

Additionally, whilst we accept the traffic levels turning into Exchange Street might be slightly lower than those estimated for the Market Street access point, despite the inclusion of access for existing residents and people shopping in the village, surely the lack of a ghosted right turn here will result in severe traffic delays.

The TA plan submitted quite frankly is 'not fit for purpose' when it relates primarily to the Taylor Wimpey and Anwyl sites and relies on the lower traffic levels continuing despite this not being acceptable to LCC.

The Revised Masterplan cannot possibly be considered until a comprehensive study covering all the outstanding traffic issues is completed as it is most likely the outcome will require the quantum of development to be reduced as per LCC's original comments.

35) Comments:

It is very disappointing to determine that the majority of comments made by the residents who took the time and trouble to respond to the previous consultations have been disregarded including those relating to the houses in Alderwood Grove, despite Penny Bennett Landscape Architects employed by Rossendale Borough Council specifically referring to this area both prior to and after the submission of the plans. The Developers also appear to treat Rossendale Borough Council in a similar manner ignoring key issues in the Letter from Head of Planning to Agent dated 18-05-2023 by specifically failing to make *"the scheme . . . reflect the local area"* or *"recognise the rural character of the site and wider area"* (bullet point 6 on page 9); failing to reduce the density *"near the main entrance and around existing buildings"* (bullet point 9 on page 10); not proposing *"landscaping . . . throughout the development area"* (bullet point 15 on page 10); not articulating *"the importance of boundary treatments"* (bullet point 1 page 11); etc".

Similarly, in the Penny Bennett Landscape Architects report dated 11.05.23, the first paragraph of the Conclusions on page 11 in section 5 states:

"The Masterplan and Design Code promises much: stating that an overriding principle is to create a high quality development but then **failing** to demonstrate that the views of local people or local design advice has been taken on board."

The next paragraph states: "The scale and impact of this major development on Edenfield village, which is often referred to as an 'urban area' is underplayed, and the Edenfield's rural setting is not emphasised."

The final paragraph on page 12 concludes: "The proposed housing development on the H66 allocation will bring about a profound change to the village of Edenfield, and it is essential that this Masterplan and Design Code responds to that and really does set out how the highest quality of design can be achieved, at present it does not."

The Developers have just chosen to ignore any adverse comment, whomever it comes from, whether it be residents, RBC or consultants employed by RBC. The Developers just continue to progress the Plan making no effort to compromise and treat existing residents, RBC and RBC's Consultants with contempt.

A good example of this would be the way in the revised plan they have subdivided the field between Mushroom House and the Old Vicarage purely to maximise the company's bottom line despite all comments relating to key views from Market Street and the Grade 2*-listed Edenfield Parish Church and the damage to existing properties due to the excessive housing density and poor design layout.

In almost every section of the Revised Masterplan there are statements highlighting that key issues have not been resolved and the developers blandly covering this with comments similar to '**to be refined through subsequent individual planning applications'**. Surely this is unacceptable.

These issues include housing density, housing heights, massing, interface distance, excessive loss of key views, protection and enhancement of valued landscapes, lack of sympathy with surrounding built environment, the use of poor quality materials and unresolved traffic assessment problems.

I would just like to highlight again that in addition to all the alternative sites Edenfield Community Neighbourhood Forum identified at the Local Plan Examination stage they also commented that there was sufficient supply to cover the 400 homes in H66 from windfalls and the excess from small site development sources over the 17 years of the Local Plan.

The level of planning applications they highlighted at the time has continued to come forward and in fact RBC's website claims there is 'a large increase in Planning Applications'.

We can only live in hope that Rossendale Borough Council will act on behalf of its residents and reject the plans until such time as the Developers take into account the problems highlighted by the residents who are seeing their village downgraded, and their privacy, daylight and views decimated along with their well-being.

Conclusion

As the developer of the central part of H66 is making no serious effort to address the fundamental issues, we submit that the time has come to reject the draft Masterplan and refuse the planning application.

Alan G. Ashworth and Carol Ashworth

07.08.23.

For the attention of James Dalgleish Objection to Land west of Market Street – Site H66 - 2022/0451

Edenfield Masterplan

This is still not a comprehensive Masterplan with an agreed design code for the whole of Site H66, and is still predominately a Taylor Wimpey plan.

There are many of the policies in the NPPF which have not been met in this Masterplan.

There is nothing in this Masterplan to suggest that this is a well designed place with individual characteristics or will add character to the existing village.

Stake Holder Engagement

To suggest that a public consultation exercise was undertaken is a mystery. It was not inclusive of all residents of Edenfield, with limited information. I am still awaiting a reply to my enquiry sent over 12 months ago.

Street Hierarchy

"These take access from the M66/A56 roundabout" this is an untrue statement as the M66 cannot be accessed from any part of Edenfield.

Land Use

The RBC adopted Local Plan shows the dwellings per hectare should not exceed 29. Therefore the Taylor Wimpey site should be reduced to 206 dwellings, not 238.

Market St corridor- proposed improvements

It would appear that this proposed improvement to the Market Street corridor has not been fully thought out or visited by the persons responsible for drawing it. It has been produced using an Ordnance Survey map, which is out of date.

Exchange St

The entrance to this development is to be widened (presumably to accommodate construction vehicles). The corners of Exchange St and Highfield Road are also to be widened.

As Exchange St is proposed to be one way, it is obvious that traffic from the Anwyl site will enter and leave via Highfield Road, The Drive, Eden Ave and Bolton Road North as these roads are wider and easier to navigate. Motorists will always find the easier route to drive along. In this scenario, entering via <u>Exchange</u> St for traffic arriving from the south would mean negotiating a roundabout, a pedestrian crossing and a tight turn into Exchange St and 20mph speed limit. As Anwyl have not produced a comprehensive Masterplan, it is difficult to determine the impact on these surrounding Streets.

A car park is to be made just at the entrance to the development for 10-12 spaces. Again as a comprehensive Masterplan for this site has not been made available, it is not clear whether this is to accommodate the residents of Exchange St or for the use of vehicles arriving to visit the village (for example, parents, who live outside the area, bringing their children to use the newly installed pump track, which is not shown on the plan. The entrance to which is from Exchange St and in close proximity to the Anwyl entry/exit road.). It is clear that 10-12 spaces are totally inadequate.

The proposed yellow lines on the west side of Market Street will have the greatest impact on both residents and businesses.

Not all of the customers to the shops ,at the southern end of Market St, are residents of Edenfield (who mostly walk to them). These businesses will certainly suffer financial losses as customers from outlying areas who arrive by car, will be unable to park. In the Rossendale Borough Council adopted Plan it was stated that the development of the site H66 would enhance the village of Edenfield and promote the economic growth of the area. The proposals for the reconfiguration of Market Street, will have the opposite affect and the economy of the area will be reduced.

In particular M. R.Cook, Butchers on the corner of Exchange St and Market St will lose on 2 fronts. Further along Market St, there are 3 shops who will also have problems, where no parking is proposed, between 8AM-6PM Mon-Sat.(There is no provision for where the vehicles which currently park during this period on this length of highway are to park)

My Plaice (takeaway Fish and Chips), Scout Moor Pharmacy and the Golden Kitchen(Chinese takeaway). All three of these shops front Market Street and are located in the middle of a terraced block of properties.

There is no rear entry vehicle access or side street parking available. The proposed parking bay on the east side of Market St from no 8-no24, will only serve the properties mentioned. Where the property is a 2 car ownership, both sides of the carriageway are used for parking. There does not appear to be any mitigation for the displacement of vehicles on this section of Market St, including the owners of the above mentioned businesses (2 of these owners are not residents of Edenfield)

All 3 of these shops have regular deliveries of products needed to carry on their business. 2 are takeaways, so use fresh food, hence the need for regular deliveries. The vehicles used to make these deliveries are large, so will cause problems in any space available in the parking bay on the east side of Market St. This would also give rise to safety issues, having to cross the road with heavy boxes.

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The pharmacy offers a prescription delivery service and uses a vehicle to do this, as to walk through the village carrying drugs would also cause safety issues.

The footpath outside of these shops is very narrow and passing pedestrians sometimes have to step into the roadway, particularly parents with prams. This results in further safety issues.

Property no 26-42 Market St.

These properties also have a proposed parking bay, again this will only serve some of the residents of these properties. Residents unable to park in front of these properties, park on the west side of Market St. Again no provision has been made to the displaced vehicles in this area.

Elizabeth St

no longer exists as a street. This is now a courtyard which has outdoor seating for the benefit of customers of The Drop Off café.

The junction adjacent to the Elizabeth St courtyard is not annotated on the map. This should be shown as Heycrofts View, which is a development of detached properties, all of which have wide drives and dropped kerbs. Therefore neither Gincroft Lane, Elizabeth St or Heycrofts View can accomadate street parking. <u>Property nos 51-77 and nos 66-74</u>

It is proposed to introduce Parking Bays to the front of these properties.

On the east side of Market St, no provision has been made for properties no 58-64.

Property nos 76-82.

No 82 Market Street is no longer a single property, (used to be the Conservative club) it is now 5 apartments with no off street parking .

Therefore this parking bay is insufficient for the number of vehicles currently parked. Spaces outside no 88 and 98-100 are used by the residents of no82.

On the west side of Market St the map shows an area between no 77 and the Lane leading to Mushroom House as a collection of various lines. These would relate to the Horse and Jockey public house and outbuildings, which were demolished and replaced by 10 houses some years ago. 4 of these properties front Market St, the remaining 6 are situated at the rear of the site and are known as Pilgrim Gardens. Consequently the junction from the centre of the development is not shown on the map.

Bus Stop

It is stated that the existing Bus Stop is to be relocated. It is assumed that this Bus Stop will disappear altogether as the Footpath widths going South are too narrow.

There is already a Bus Stop adjacent to Alderwood grove. This will not serve to promote the use of Public Transport.

The proposed new kerbs on either side of the entrance to the Taylor Wimpey development would appear to reduce the width of the existing footpath (there is no indication of what the width of this footpath is proposed to be) from where the existing Bus Stop is placed to the curve of the entrance. Similarly on the outward curve opposite no 112 Market St.

The yellow line on this stretch of the street stops at no 115 Market Street.

Properties no 115-129 Market St do not have a yellow line, parking bay or annotated no parking at any time. It is therefore assumed that kerb side parking is to be allowed along this length of highway.

Car Park

The 13 parking spaces on the field adjacent to 115 Market Street, per documents submitted by Taylor Wimpey, is to be an unsecured open parking area and available for use by all (including the new residents of the development). This will impact the residents of Market St whose vehicles will be displaced by this proposal, as automatic spaces are not to be provided.

Rossendale Bprough Council adopted Local Plan states that parking provision for existing residents should be conveniently located to the development it serves, be safe, secure and benefit from natural surveillance. The parking area does not provide any spaces for disabled parking, motorcycles or cycles. There is no provision for visitors or maintenance vehicles eg Plumbers, Electricians, Roofers, Decorators etc working on properties on Market Stree) There is no spare capacity for future residents of Market Street, where a change of hands results in a property going from a 1 car owner to a 2 car ownership. As a Masterplan is designed to cover the long term future of the development and not just the present, the off street parking area does not have any provision for the introduction of electric car charging bays.

The document covering street lighting, shows only2 street lights are to be provided in the car park. These lights would not be sufficient to light the whole of the area, particularly the dark corners. As a result this will cause anxiety for some drivers, especially lone drivers or those with mobility issues or visual impairment (where bright light is a necessity in dark places) having to walk from the car park and along the footpath to reach their destination.

Properties 102-136 Market Street

A parking bay is proposed in front of these properties. There are currently 14 cars park in this space overnight.

Between Pilgrim Gardens and Alderwood Grove there are a minimum of 39 cars parked overnight. Assuming that parking is to be prevented outside no 115-129, then 13 spaces to be provided on the off street car park is totally inadequate. Even more so as the residents of no 82 will require additional spaces. The number of vehicles parked overnight on the whole length of Market St has not been taken into account in producing this "Improvement of the Marke Street Corridor"

Proposed priority right turn.

The dimensions of the lanes to provide this turning seem to be rather narrow. The priority lane is shown as only 2.2mtetres. This would not cater for larger vehicles ie delivery vans, supermarket food delivery vehicles etc. A disruption to the flow of traffic is inevitable

CD123 regulations have not been adhered to. The priority lane should be a minimum of 3 metres. As Market St is a Bus route, the passing lanes would barely allow a bus to pass

Keep Buses Moving.Gov.UK states a Bus requires at least 3.5 metres to safely pass standing traffic. It is not feasible for this junction to be safe for a development of 238 houses plus the Market St residents whose vehicles will be displaced.

The widening of the footway on the east side of Market St has still not been addressed.

Properties no 153-159

Page 4

There is no provision for parking on either side of the road for these residents of Market Street. 159 Market St is not shown on map.

Coach and Horses public house and restaurant.

The yellow line outside this business will also cause a loss of business, particularly in the Evening when customers visit from outside of Edenfield for a meal. There is also the problem of delivery of products, as well as food for the restaurant, the Dray for delivering beer. It is not possible to carry barrels of beer any distance.

Properties no 167-175

The yellow line seems to stop just before 167 Market St. If this is correct, then it is assumed that kerbside parking is allowed after this point.

Properties no 162-188

It would appear that kerbside parking is also allowed in front of these properties as there is no yellow line or no parking at any time annotations. (Property no 162 is now 5 apartments)

It would also appear that there will be no parking restrictions outside Edenfield Parish church.

The entry/ exit road to the Northstone development on Blackburn Road also appears to have a wide Radii. This will hinder pedestrians crossing, particularly the visually impaired and those with mobility problems.

The proposed car park and school extension.

Both of these proposals are currently green belt land and were not included in the Rossendale adopted local plan. To approve these proposals would set a precedent for the Council to remove further areas of green belt land at will. By using this land to provide a car park and school classroom could result in further housing development in the future, should these facilities be deemed no longer needed.

Apart from all the above issues, there is the impact on current residents of MarketStreet on their daily lives.

As well as the parking issues the introduction of yellow lines and no parking at any time on most of Market Street, the following problems should be considered :-

- 1. Loading and unloading of own vehicles, particularly the weekly shop. Carrying bags of shopping or other goods purchased any distance would be an issue for the elderly or disabled, particularly during the dark winter days, inclement weather and icy footpaths.
- 2. Delivery of white goods eg Fridges, Freezers, Televisions, Beds etc
- 3. Delivery of goods, ordered on the Internet and delivered by private carriers
- 4. Removal vehicles for both outgoing and incoming residents
- 5. The placement of skips should major work be needed, for example a complete re roof, replacement of doors and windows.

Phasing

The phasing recommendations do not preclude that all 5 developers (now includes 2022/0577, Alderwood) from constructing at the same time. This surely is inappropriate, and detrimental to the existing residents of Edenfield, regarding dust, noise, excessive construction traffic and general health problems.

Homes and Buildings

HB02 Does this statement just apply to the new builds? The placement of the new builds is going to impact on some of the current residents of Market St and reduce the daylight and privacy presently enjoyed.

The suggested 238 properties to be built by Taylor Wimpey, do not include any homes which can be easily adapted for the disabled, either with mobility or sight issues. The proposed improvements to Market St also ignore the current pavement widths on both sides of Market St and do not consider vulnerable pedestrians on which will become an extremely busy road.

This whole plan is based on the new residents of the development, who will enjoy parking outside their front door, a peaceful and quiet neighbourhood and have the benefit of as much daylight as possible. There is no consideration given to the current residents of Edenfield, some of whom have lived here in excess of 50 years.

There are too many "to be dealt with at a later date" or "with subsequent Planning applications" to enable a comprehensive objection.

We therefore submit that the application be refused on the grounds of the comments referred to. Regards M. Filkins and G. Worth

Objection to the Masterplan and Taylor Wimpey's planning application

Application no: 2022/0451

This is my objection to the above and the reasons why.

General

• The masterplan is for Taylor Wimpey and not the whole site that is being proposed and the other planners. This should be led by RBC or the four developers as required by the RBC local plan.

• This is a charming village with a sense of community. This will be lost with the amount of proposed houses.

- There is not the infrastructure to support all these houses.
- The cost to the environment, pollution, flooding to the A56, loss of green space.

The Village as a whole

• The double yellow line system, affecting residents, discriminating against the elderly, those with children and the disabled making every day living difficult if not impossible.

• Discriminating against local business as the double yellow lines will affect them – no parking – no customers – no business – loss of livelihoods – loss of community.

Edenfield South – Will affect my household directly.

• One way system on Exchange St - ludicrous and will not resolve safety concerns. Blind turning left onto Exchange St which is a major issue for vehicles, pedestrians and cyclists.

• Highfield Rd/The Drive/Eden Avenue not built to take the volume of traffic that will travel down an already congested road with double parking, children playing. Visibility is poor and so safety of cyclists both adult and children and pedestrians. The roads are not wide enough for the cars they already serve.

• The Pump track is opposite the junction of Highfield Rd and Exchange St, a serious safety concern for the children playing/cycling on it, to and from it.

• Double yellow lines, Market St and Exchange St will reduce footfall to the local businesses and potentially reducing/stopping any new businesses starting up. Again, discrimination for the residents (who will not be able to shop locally) and the businesses that are and have been established in this village for many years.

• Again, the double yellow line system affecting residents, discriminating against the elderly, those with children and the disabled making every day living difficult if not impossible.

• The location of the proposed 'gateway' is in a dangerous position and misrepresents the start/exit of the village. It is unlikely to have an effect on road and pedestrian safety because of the size of the development and increase of traffic. The closure of the A56 has already highlighted this and when there is an accident of the A56/M66 Edenfield cannot cope with the traffic that travels through it.

• Who will the proposed additional parking on the Anwyl site service? Is it for residents? Not ideal and again discriminatory for those with disabilities, the elderly and for the safety of those with children, especially when negotiating shopping and children etc. Is it for new residents on the new site? Will it be enforced? Electric charging points? It is most likely going to be insufficient for the amount of residents who will need it.

Edenfield – Central – will affect me as I use both the road (driving) and as a pedestrian.

• Compensatory parking for residents will not be large enough nor fit for purpose. Electrical charging points? Trades people? No disabled provision. Again, discriminatory against residents and especially those with disabilities, the elderly and those with young children.

• No phasing proposal for the TW site and therefore congestion will be severe and detrimental to traffic, pedestrian and cyclists safety.

• Flood safety risk, run off water (greenbelt removed therefore nowhere to absorb water from rainfall) onto the A56 which has already had known failure of infrastructure/embankment and could reduce stability further and put road uses at risk (M66 had a recent fatality because of a waterplane after heavy rainfall, which with global warming as from what we have already seen is on the increase). 82 Market St not a single dwelling and the old Horse and Jockey site now Pilgrim Gardens with several houses and a junction that leads onto Market St.

• No space to relocate the bus stop.

• Only one crossing point, not wide enough to incorporate cyclists and serious safety concerns for pedestrians. In particular young vulnerable primary aged school children crossing Market St from the south side.

• Pavements not wide enough and to ensure safety of pedestrians, they should be 2m wide yet roads not wide enough to incorporate this width.

• No greenspaces in the proposed housing development as recommended in the Places Matter Design Review Report. Cramped layout and poor design (no character whatsoever) thus cost saving!

• Maps incorrect affecting the accuracy of traffic proposal and leading to further road and pedestrian safety concerns.

Edenfield - North – will also affect myself as I use both these roads as a motorist and as a pedestrian.

• Proposed release of MORE GREENBELT on the opposite site to the proposed building. This is not included in the Rossendale adopted local plan and would set a precedent for the council to release more greenbelt land. WE WILL HAVE LOST FAR TOO MUCH WITHOUT THIS ADDITION!!!!

• Proposal of 2 more junctions resulting in EIGHT junctions concentrated in one very small area, all entering and exiting a 30mph zone, all with limited visibility and so MORE serious safety concerns for pedestrians, young children going to and from school, cyclists and all traffic.

• Gateway proposed – As already said in Edenfield South.

• MORE double yellow lines in front of houses discriminating against residents already living in Edenfield, the elderly, disabled and those with young children.

• Uncontrolled crossing area at school which is not wide enough for pedestrian safety. How will children be supervised crossing the road – VERY SERIOUS SAFETY CONCERNS!!!!

• Parking for those dropping off children at the school. Already restricted, already narrow road, already no crossing patrol. Congestion at drop of and pick up untenable and will be VERY VERY dangerous to ALL pedestrians and traffic alike!

• No crossings on Blackburn Rd or Burnley Rd – serious safety for the residents on these roads along with other pedestrians using these roads. Safety for children walking to school, the elderly and those with disabilities.

• Cycle path from centre of the village (as in masterplan) which does not appear to link to the cycle path north of the village: Church Lane; hence NOT FIT FOR PURPOSE!!!!

AND OF MASSIVE CONCERN

- No comprehensive masterplan including all input of ALL developers.
- Proposed further release of greenbelt.
- Greenbelt compensation proposals are unclear and need clarification.

• Proposed new junctions unsafe and not fit for purpose.

• Serious traffic, cycle and pedestrian safety concerns could result in serious injury or worse still a fatality.

• No road safety audit, despite this being raised as a concern on several occasions and it is believed the traffic proposal would not pass a road safety audit.

• Double yellow lines and restrictions on parking will have a negative effect on local businesses resulting in a negative effect on the local economy, not to mention the livelihoods of those businesses and opposite of what was promised in the local plan.

• No phasing proposal, concerns over road safety, pedestrians and cyclists, if phasing is ignored and building undertaken simultaneously.

• Discrimination of existing residents to accommodate the needs of residents in new houses.

• Risk of flooding overall but in particular the A56 leading to serious traffic and public safety concerns (which is apparently awaiting national highways feedback).

Janet Campbell

Edenfield master plan and Taylor Wimpey planning application 2022/0451

Dear sir/madam,

Im writing to register my objection to the plans. I have objected many times before and I think that the tactic of revising the plan by small amounts then making people like me object all over again is an underhand way of minimising objections in order for the plans to go through.

I live at **Example 1** so the development will directly impact me in a negative way. I object for all the same reasons I objected on previous occasions and I am in full agreement with the Edenfield community forum on their objections.

Green belt land must be protected at all cost for the sake of the environment and for the local people.

Yours sincerely Henry Botham

Sent from my iPhone

Good Evening,

Ref: 2022/0451. Site H66 Masterplan and Design Codes. In particular H66 Site: North (Junction of Burnley Road / Blackburn Road, Market Street).

We have previously submitted an objection to the Edenfield Master Plan and Taylor Wimpey submission (Ref 2022/0451. Site H66 Masterplan and Design Codesl) back in January 2023. We restate our original submission's objections towards the bottom of this email for convenience because we still believe these concerns are valid and have not been addressed satisfactorily in the resubmission, and we want to restate them to ensure they are considered once again.

We would now like to submit additional points of objection following the revised submission by Taylor Wimpey which have provided further areas of concern:

1. No Parking on Market Street

This will reduce footfall to existing businesses on Market Street adversely affecting the few facilities provided in the village. Residents who do currently park their vehicles on the proposed restricted length of the street will not have alternative provision provided by Taylor Wimpey on land proposed to be developed by Taylor Wimpey. The proposal does not take into account residents who may have specific requirements to park close to their homes such as those with limited mobility, nor provide consideration or compensation for those who have invested in and installed electric charging equipment for private vehicles.

2. Traffic Assessment Concern

The revised assessment notes traffic is still below pre-pandemic levels. However there may be several, perhaps temporary, factors causing the low figures observed at the time of survey which are likely to cause the numbers to increase over time. Working from home appears to be on the wane with some companies now asking workers to return to their offices and public transport subsidies, currently capped at £2 rising to £2.50 shortly, are scheduled to end in November 2024. We refer you to consider the census data relating to modes of transport (noted in our previous objection) which remains valid.

3. Traffic Management Assumption is Incorrect

It is incorrect to believe that residents in the north of the village access the A56 at the Bent Gate roundabout whether travelling north or south. It does not represent the reality of the daily traffic flow and should not therefore be used for traffic management planning. Village residents travelling north may well join the bypass at this roundabout but those travelling south will pass through the village to the junction on Walmersley Road. Has a traffic survey been conducted at Bent Gate to ascertain whether or not this junction could cope with the extra traffic? Additional surveys and consultation with the Highways Agency and LCC are necessary to understand the cumulative impact of the additional traffic the developments are expected to generate.

4. Proposed Allocation of Green Belt Land for the provision of a car park opposite 1-5 Spring Bank, Burnley Road / near Edenfield Primary School

There is no justification for removing land from the greenbelt to provide a car park. Furthermore it is not for Taylor Wimpey to incorporate this as a suggestion in the Master Plan on the assumed approval of another landowner / developer, and the assumed approval of the council to re-designate the land. The caption on the diagram on page 23: "land available for car parking and POS" is both misleading and inaccurate. It does not reflect the current designation of the land. Furthermore the size of the proposed car park in the same diagram is considerably larger than the initial very-early-stages proposal Northstone shared in consultation relating to this area; again this shows a regrettable lack of accuracy in the overall Master Plan resubmission.

National planning policy allows for the removal of land from the green belt when there are 'exceptional circumstances' for doing so. A car park is not an exceptional circumstance. Especially when consideration is given to how much green belt land has already been lost to the proposed development area, some of which should be used for such an amenity rather than requesting additional land.

A car park on this particular field will result in the flooding of local homes; particularly the five Spring Bank properties and 34, 36, and 38 Burnley Road. Taylor Wimpey appear unaware, as were Northstone / Peel, that this field contains a culvert which provides vital drainage for run-off from the surrounding hills. During relatively short periods (two or more consecutive days) of medium volumes of rainfall the field is often flooded (see media included in this submission) and any building work/hard standing will adversely affect neighbouring properties with run-off entering those properties rather than naturally draining away. There is no provision in the Master Plan regarding new drainage works to remediate this, nor any provision of compensation for homeowners for actions resulting in making their homes ultimately unsuitable for habitation and/or unsellable. It cannot be an exceptional circumstance to release green belt land to flood existing homes simply to provide a car park.

There is no mention of provision for security arrangements which would be required for a car park to ensure no misuse, loitering, encampments etc. This is not acceptable. More information is needed on this and on proposed opening hours, parking charges, maintenance responsibilities etc. Especially if the proposal intends for a car park to be open all day for those who have been displaced by the proposed no parking on Market Street rather than just during school hours. Note this particular point is valid regardless of where a new car park would be situated within the development.

If this car park is intended for use by those visiting or teaching at the local primary school then a full traffic assessment of the flow and impact needs to be undertaken and submitted. Additional delays, both to users of the car park and to other motorists, and additional pollution and noise from those delays can be expected when vehicles wait to enter and exit the car park, lowering the quality of life and air standards for residents in the area. The Fingerpost junction would need to be redesigned to accommodate the changing patterns of traffic resulting from ingress or egress to the car park; no proposal is made as to how to do this. It should be borne in mind that the current "school run" is a known event and ultimately finite in terms of car numbers, with residents in the local areas very aware of the temporary impact at particular times of day with most if not all cars well away from the area by 5pm. A

car park would increase the duration of the school run; this is not an advantage nor benefit to the village or residents. It would also discourage parents and guardians from looking for alternative, greener, modes of transporting their children to school.

Therefore we reiterate our objection to the proposed development. Because we have had difficulties with the online portal, could you kindly acknowledge by reply this submission in full will be included in the objections for this planning application.

Yours sincerely, Karen Farquhar and Nadia Krasij,

Photo taken 23rd July 2023 showing recent flooding of the field proposed to be taken out of green belt for the provision of a car park (opp. 1-5 Spring Bank, Burnley Road).



Video from February 2020 showing a more prolonged period of rainfall (constant but not heavy for four+ days) and the impact on the Burnley Road houses in particular.

Original Objection submitted via the council's online portal on January 15th 2023 regarding this application, the Master Plan and Design Codes, and which we wish to ensure are considered again as part of your assessment:

- Reasons for - Affect local ecology - Development too high comment: - Inadequate access - Inadequate public transport provisions - Increase danger of flooding - Increase in traffic - Increase of pollution - Information missing from plans - Loss of parking - More open space needed on development - Noise nuisance - Out of keeping with character of area - Strain on existing community facilities - Traffic or Highways
- Comments: Dear Sir / Madam,

We write to raise an objection to planning application 2022/0451 - the erection of 238 dwellings in part of allocation H66 in Edenfield. We will also be commenting on further aspects in Taylor Wimpey's commissioned "Masterplan and Design Code" document which cover the remainder / total of the H66 allocation.

Before going into detailed objections we would like to highlight the recent change in Government policy regarding mandatory building targets. The Local Plan notes, and Councillors have been at pains to point out, Government-determined mandatory targets when attempting to justify the re-designation of Green Belt land (which should only be done under "very special circumstances") in Edenfield. Now mandatory targets have been withdrawn, the opportunity should be taken to review the Local Plan to distribute housebuilding sites in a more sympathetic manner with less Green Belt land impacted, and giving due consideration to the equivalent land area in Brownfield sites available throughout Rossendale to support the number of dwellings proposed in 2022/0451, and in H66 / Edenfield overall. Application 2022/0451 should be withdrawn for the developers to consider alternative Brownfield sites in the area which would provide ample opportunities for good quality housing with considerably less environmental impact.

H66 "Masterplan and Design Code" Document (Ref: "610E Edenfield Mplan Dcode V8")

Taylor Wimpey's H66 Masterplan and Design Code document raises a number of concerns and fails to address the significant risks and impact of the erection of over 400 dwellings within Edenfield. The document does not represent all developers involved in the H66 discussions and may actually misrepresent the land ownership within the so-called "Edenfield North" sub-allocation. Indeed it could be argued that the document (and by extension because this is a core document - application 2022/0451) should be withdrawn from submission on those points alone.

This is the only document relating to H66 which is labelled as a "masterplan". However it is not a Masterplan authored or accepted by the council or community. The lack of RBC-authored Masterplan and integrated planning documents with other local councils, service providers, and government agencies (DoE / DoH / DoT / Highways Agency etc) is a matter of regret because it undermines significantly the case and practical realisation of a development of this scale. Without any integrated masterplan, any medium to large development - certainly one on the scale of 2022/0451 - cannot succeed. The application should be withdrawn or rejected giving

the council an opportunity to produce its own masterplan for the H66 site.

2022/0451 Specific Objections

Lack of Infrastructure Provision

Education

The application does not adequately consider the impact of the scale of the development and expected population increase on local infrastructure. Edenfield CoE Primary School and Stubbins Primary school are at or nearing capacity and there are no plans submitted as part of this application (or in the Masterplan and Design Code document) to expand either during the proposed timescale of this development. Squeezing in additional children into either establishment will be to the detriment of all pupils. Further consideration is required and an integrated expansion and growth plan, developed in conjunction with the local education authorities, is needed.

Healthcare

With the exception of the chemist, there are no medical facilities in Edenfield. Neither the Application nor Masterplan and Design Code include any provision for new facilities or expansion of existing facilities in neighbouring towns to accommodate expected growth. The increase in population expected will add a further burden on an over-burdened local healthcare system. Further consideration and discussion with local healthcare providers is needed to develop and submit proposals which will address this problem.

Utilities

The application does not include detailed proposals regarding infrastructure provision and/or capacity increases for water, drains, and gas to the site, nor does it seem to acknowledge or consider the ageing pipelines and give undertakings to upgrade to adequate support the scale of development without impact or reduction in provision to local residents. For awareness there have been at least two major water bursts in Edenfield in the last four months alone. Low gas pressure can regularly be experienced in Edenfield; this will impact existing and proposed developments and will need addressing.

Transportation

The application is optimistic in its projections for additional car journeys and use of public transport. Recent data gathered and submitted in Taylor Wimpey's commissioned traffic assessment appears to be for one day in June 2022 only, alongside utilisation of data relating to a location near Preston rather than a more comprehensive analysis of the traffic flow through Edenfield itself which could have been taken over a longer timeframe. When submitting an application of this scale, with significant uplift on traffic flows and footfall, a more comprehensive analysis is essential rather than the token gesture submitted herein. The application should revisit the traffic analysis and give the proper time and attention needed to do this properly, and resubmit accordingly. More comprehensive analysis will no doubt encounter the regular snarl-ups and traffic jams which occur in the village, at the roundabout near the Rostron Arms in particular, and give more accurate "queue" times.

Whilst proposals to increase the use of public and other non-car methods of transport are always welcome, the reality shows there is some way to go to change which methods of transport are used by residents of Edenfield. The recent census shows 63.5% of journeys to work are by car (including passengers); only 1.6% by bus, and 3.9% on foot. There is no direct public transport route from Edenfield to Rochdale, and limited capacity on the public transport which does go directly through the village during standard commuting times. Underestimating the likely number of additional car journeys in the application, and insufficient road ingress and egress planning to the site, raises questions regarding whether the environmental impact and the impact on the quality of life and health of Edenfield residents due to the additional pollution

and noise introduced by the number of additional car journeys have also been underestimated or inadequately considered.

The application has included data regarding traffic accidents to paint a favourable picture of free-flowing traffic through the village with minimal accidents. However the data being used relies on reports being submitted to these sites; it will not therefore reflect all the near-misses, the clipped wing mirrors, nor the scrapes along the sides of vehicles that we, as residents of Edenfield, see regularly and which are not likely to be submitted to such websites to "track". Living close to the Fingerpost garden we can state there is a near-collision at least once a week due to poor traffic light and road design when drivers are heading North from Market Street onto Blackburn Road where they will see both a traffic light and a Give Way sign; if you don't know this junction you may assume the traffic control is controlling the flow of traffic on your route onto Blackburn Road when it does not. Neither the application nor the Masterplan and Design Code document include adequate detail on proposals to resolve existing road layout concerns, nor have adequately considered traffic management needed for ingress and egress to the site.

Surface Water, Drainage, and Land Slippage Considerations

Building on land close to the proposed site in the past has resulted in land slippage and corrective and mitigating actions being required to steady the land and ensure no slippage onto the A56. This is part of the reason there are no dwellings on this site currently. The Slope Stability Assessment Document notes a number of concerns and has a large number of recommendations in this regard. The application itself does not appear to adequately consider this; plots and therefore dwellings are dangerously close to areas not recommended to be built on without significant remedial action (if built on at all).

Increased heavy bursts of rain have been experienced in recent years and will increase in frequency. The ground on which the application proposes to build holds and drains a lot of surface water. There does not appear to be a detailed risk and impact assessment of surface water and associated flooring as part of the application, either to the proposed development itself or to the wider village and surrounding areas. Building on this land is not desirable; the water will have nowhere to go other than onto the A56 and existing properties. The recent Parsonage Gardens development has seen exactly this with increased surface water now flowing downwards because it cannot drain, with detrimental impact to existing properties. This was not given proper consideration by the developer nor RBC during the Parsonage Gardens application and building processes so lessons must be learned for any further developments to the West of Market Street.

The 2022/0451 application, whilst including the provision for a couple of "drainage ponds" does not give detailed consideration to the need for proper, sufficient, drainage as recommended by the Slope Stability Assessment and the recent experiences of the Parsonage Garden development. The application should be withdrawn to enable this to be remedied and for all of the recommendations of the Slope Stability Assessment to be considered in detail. No doubt replanning the application to include a sufficient drainage management system will recast the timeline of the development as a whole, notwithstanding the need for greater consultation with local authorities and the Highways Agency regarding any impact to the road infrastructure. However, the risk of not giving proper consideration to the geology, increased rainfall projections and reduction in natural drainage, and proceeding to build dwellings on potentially unsound ground is not worth taking.

Scale and Style of Development

The scale of the development is significant and will fundamentally change the make-up and character of Edenfield. We reiterate the lack of integrated planning with other potential

developers for the H66 site as part of this application, the overall lack of an H66 Master Plan developed by RBC, and lack of integrated and considered planning of healthcare, education, and transportation needs. The scale of this development is simply too much, too quickly, and with too few supporting services. Smaller scale development is more in line with what Edenfield can realistically support, and there are local Brownfield sites available in the vicinity.

The designs proposed, including the height of the dwellings themselves and the need to introduce 2.6m and 2.1m structures to serve as acoustic barriers (not a commonly necessary feature of Edenfield housing) do not constitute sensitive urban design and are not in keeping with the rest of the village. The applicant's design proposals have not given adequate consideration to sympathetically "blending in" in an attractive way. The application should reconsider this in line with the ECNF's Design Code.

There are not enough two or three bedroom dwellings in the application which is to the detriment of addressing social housing concerns and the shortage of provision of smaller houses with fewer bedrooms as a whole nationally. The application should reconsider the split of dwellings, increasing the ratio of number of dwellings with two or less bedrooms.

In conclusion, we object to this application and request that it be rejected.

Yours sincerely, Nadia Krasij and Karen Farquhar.

Masterplan / Design Code for Site H66 Land West of Market Street, Edenfield

The proposed Masterplan is unacceptable and is fundamentally lacking in a sympathetic response to the locality, the unique village character and community needs. Proposals for solutions to major issues such as traffic, parking, drainage and schools are inadequate, unworkable or in some cases not addressed.

There is a sense of an attempt to make things fit for the benefit of the developers based on vague ideas, ill thought out proposals and baseless claims rather than focussing on the needs of the community.

See also our objections to Taylor Wimpey's planning application including specific comments about Alderwood Grove.

Key Issues about the proposed Masterplan and Design Code

- clarification is needed that this is a Masterplan jointly supported by all the developers of H66 site and that there is an undertaking by all to commit to it.
- it does not demonstrate that it is working with all stakeholders as claimed. In particular it specifically disregards the ECNF.
- It is not evolving in response to concerns and issues raised by the local community, the Local Planning Authority, Highways Authority, Lead Local Flood Authority and the Places Matter Report and other expert opinion such as Penny Bennett, Landscape Architect.
- the Masterplan is not comprehensive, making it open to interpretation and ineffective. It appears to be Taylor Wimpey focused.
- The Masterplan and Design Code are inadequate with key areas that are not satisfactorily addressed -
 - 1) Transport and parking
 - 2) Schools
 - 3) Green Belt Compensation
 - 4) Landscaping within the site
 - 5) Drainage
 - 6) Implementation and Phasing
 - 7) Construction ground levels and heights of buildings
 - 8) Conservation / enhance the setting of the heritage assets
- the implementation and phasing suggests that the order may vary and could be delivered simultaneously, which makes it meaningless and unworkable.
- there is too much emphasis on 'Urban' in the Masterplan The status of Edenfield identified in the Local Plan as an 'Urban Local Service Centre' seems to be have been mis-interpreted and is not a charter to create development that is based on urban character. It is another example how the developers seem to be focussed on urban, completely ignoring the rural nature of the village.Various Local Plan policies emphasis the need for a well designed scheme that responds to the site's context, which is clearly not urban.

- the Site Wide Codes and Area Type Codes do not consider the special character of the village adequately and as a result will have a major adverse impact on the village and the community in terms of quality of life and stress on infrastructure.
- the proposals do not preserve the openness, significant views and historic nature that crucially form the main character of the village and its sense of place that fixes it in the valley.
- the use of high acoustic fences will urbanise what is currently a route through a rural valley.
- the design and layout specifically do not minimise adverse impact due to their scale, heights and density of building, with little green space within the site. It is predominantly developer-led.
- the design and layout are unsympathetic and damaging in their approach to existing neighbouring properties.
- there will be significant damage to the environment with loss of substantial areas of green open spaces and consequent impact on quality of life.
- the proposed traffic management and parking solutions are not satisfactory and unworkable.
- the proposals to create a parking area in the north and possible extension to the school would involve further release of green belt land, which would be unacceptable.
- the development of site H66 is not sustainable, exacerbated by its scale.
 Edenfield's location in the south of Rossendale means that access to main services, including doctors, dentists, supermarkets and employment will encourage the use of cars.
- the site is disconnected from the Haslingden /Bacup corridor, areas identified by the Council for regeneration.
- the proposed building of properties in proximity to the By pass requires additional resources to make them habitable.

Authority and commitment by all developers for the Masterplan

No reference is made on whose behalf the document is being submitted. There is no point having a Masterplan that is not supported by all developers on Site H66.

Consultation - Working with Stakeholders

"Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a Masterplan is prepared"

Local Plan (paragraph 121).

Government guidance suggests Design Codes are best prepared in partnership to secure agreed design outcomes and maintain viability particularly across complex sites and phased multi - developer schemes.

The claim that this Masterplan has been developed in consultation with the Local Planning Authority and local stakeholders is misleading. In particular the ECNF has been ignored. The Masterplan admits that ECNF's emerging Neighbourhood Plan "has only been given limited weight".

The stated reason is that the Neighbourhood Plan is focussing on "the existing vernacular and characteristics of the village" but these are precisely the bases on which a Masterplan should be developed.

Similarly it says that "limited weight" has been given to the Design Code prepared by AECOM, an a highly reputable world wide organisation.

Local community

The NPPF recognises the importance of designs evolving in response to local issues and to the views of the community.

There has been no public consultation for a Masterplan for the whole of the H66 allocation as claimed in the 'Stakeholder Engagement' section of this Masterplan.

The Masterplan does not respond to the overwhelming concerns and objections in response to the November 2022 version of the Masterplan, the Taylor Wimpey Planning Application and Northstone's pre-application consultation.

The unwillingness to engage with local opinion or take on board expert views and consultees' feedback is a major concern and raises questions about how developers can be entrusted to develop the area when they clearly demonstrate such a disregard.

The Masterplan is not comprehensive, excluding information about the whole of site H66 and does not provide sufficient information.

It does not meet the requirement of Site Specific Policy H66 1, that "comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing":-

Claims under the Executive Summary that the Masterplan demonstrates how it meets various criteria and considerations are vague, not substantiated and in some cases dismissive. Often comments are made that "further detail will be provided" or "details will be refined at subsequent individual planning applications", which in itself indicates that not enough information is provided in the Masterplan. There are also numerous references to Taylor Wimpey's Phase 1 for details, e.g. noise and air quality and geotechnical investigations relating to land stability, but it does not provide information about the whole of site H66.

The Alderwood site has not been included and there are no details about the land belonging to Richard Nuttall, just a reference to "potential development to come forward as later phase".

The loss of Green Belt land demands a sensitive holistic approach as the sites in H66 collectively will impact on the village and should be considered together.

Areas specifically required by the Local Plan are not satisfactorily addressed :-

1) Transport and parking -

The proposals for traffic management and parking are unacceptable and unworkable. There is no doubt that an additional 400 houses will add significantly to the problems in Edenfield and cause chaos and increased risk of accidents. The limitations of the main roads in Edenfield and the nature of Market Street in particular, with its pinch points at either end, are well known.

From experience it is currently difficult joining Market Street from Alderwod Grove most of the time and travel through the village southwards down Market Street and Bury Road is notoriously difficult. With the increased volume of traffic, it will be worse.

The traffic survey report by Eddisons seems to say that there will be capacity for the new development. The proposals then go on to suggest a range of unsuitable ways to achieve this with parking restrictions, diversions, new road layouts and junctions all with significant adverse impact on the existing village and its residents. The proposals should be rejected.

Parking

The Masterplan proposals to drastically reduce on street parking with no parking and restricted zones in order to 'improve' traffic management will seriously impact residents in a way that is grossly unfair and inconsiderate.

New off-street parking areas are suggested but will not be sufficient to meet the needs of those displaced on Market Street. There is no information as to whether these will be allocated, who will maintain them and whether there will be any charges.

The car parking area at the entrance off Market Street allows for only 13 vehicles and is arranged in a strange nose-to-tail style arc protected by some sort of mound. This creates an unattractive incongruous car feature right in the central section.

The new proposed car park at the north end on Burnley Road is opposite and away from the Peel site, across two roads and near the traffic lights. This site is in Green Belt and has not been released and consequently should no the considered. Any application to develop this Green Belt land would be opposed as it adds to the loss of Green Belt suffered already and to the urbanisation of the village.

The off street parking areas suggested are not viable alternative options for residents, being remote from affected houses and of insufficient capacity. It is reasonable for residents to expect to continue to park outside their homes and not some distance down the road. Making the site work for the development does not justify such drastic action, but rather indicates that the site is unsuitable for such a large development

The restriction on parking at the southern end of Market Street will impact the small businesses there and is unacceptable.

The new no parking zones near the school will also present problems for dropping off children and it is difficult to see how the new off-street car park on Peel land would help reduce the chaos. It is badly sited at a junction with traffic lights and with access points for the new developments around there.

Parking on the site

Car parking at the new houses is not adequate and will create problems. It does not meet the needs of households today. Increasingly vans used for work purposes are kept at home and households have more than one car. The narrow roads and lack of on-site parking will encourage parking in the street and the habit of parking on pavements, which in turn will block footpaths which will obstruct pedestrians.

The road widths are narrow and not up to LCC adoption standards. This will add to the feeling of lack of openness and will encourage parking on the footpath.

Other proposed traffic management

There are a number of uncontrolled crossings and hatched areas proposed which are cause for concern.

The one near the school is at a point in the road which is very narrow and it is difficult to see how it would be wide enough to shelter pedestrians.

There seems to be a hatched area near the junction with Exchange Street. This will mean access to Exchange Street from Market Street will only be permissible coming from the south. This has adverse affects for those travelling from the north and will result in dangerous u turns around the mini roundabout

Gateway Features and coloured chipping aggregate

The purpose of these proposed road features is not clarified but they seem unnecessary window dressing and are more consistent with defining a housing estate rather than a feature of an established functioning village road.

Rain Garden

Why is this deemed necessary and will its siting mean the loss of pavement? It is not appropriate for a busy B road running through a village and has not been identified as a necessity until now.

Exchange Street

The suggested one-way access down Exchange Street will force traffic elsewhere, particularly onto Highfield Road and Eden Avenue. These residential secondary streets are not suitable for this increased traffic.

Cycle ways and paths

The proposed joint paths for cycles and pedestrians would be dangerous unless they are wide enough to allow for segregation of users. On the Taylor Wimpey site a joint path appears to be next to part of the main road running through the site, which also adds to user risk.

At the north a joint use path runs alongside the By pass which is a poor siting given the noise and pollution from the road and its not clear where the acoustic fencing will be sited, potentially blocking any views.

2) Schools

No mention is made of arrangements for funding by all developers of any school expansion that may be required or the funding for secondary school provision as demanded by LCC as Education Authority. There is indicated potential for school expansion but this would involve further loss of Green Belt. The opportunity to release Green Belt was at the Local Plan stage.

<u>3) Green Belt compensation</u> is inadequate. Proposals are not in line with the Policies SD4 and H66 7 which requires measures to be taken **IN** the Green Belt land in proximity of the site H66. The Masterplan suggests enhancing PROWs and signs 'on site' which are not in the green belt. These suggestions are therefore not relevant. Other measures should be put forward and something more significant than a few signs.

4) Landscaping

There is little proposed to soften the impact of the development.

Specifically it also does not meet the requirements of the Local Plan, Site-Specific policy H66 5v and 5vi

v) Landscaping of an appropriate density and height is implemented throughout the site to soften the overall impact of the development..... vi) Materials and boundary treatments should reflect the local context.

There are not enough green open spaces within the development to soften the hard landscaping and create a feeling openness and connection with the surrounding countryside as there is currently.

There will be significant loss of open green spaces with such a large development so it is important that this is taken into consideration. The focus is on clusters of housing with no internal breaks. It does not complement the openness of the existing landscape, nor does it allow key views.

People need space and this is not recognised in these proposals. It does not allow for enough space around dwellings and open-plan style landscaping which would complement the landscape but instead fills it with hard landscaping including high walls and fencing.

The so-called green corridors said to 'permeate through the development areas' are largely based on the existing PROWs which will offer a completely different experience when undergoing urbanisation and losing the openness and expansive views across the whole valley to the hills. So much so that they will not be attractive to use. PROW 126 has the additional aspect of negotiating the main site artery road which will run across it.

More soft landscaping is needed at the boundaries with existing properties, to preserve openness and visual amenity.

5) Drainage and flooding

Drainage is not fully covered for the whole of the site H66. SUDs are indicated on the Anwyl and Taylor Wimpey land sites. Ponds of this nature are not a natural feature of the landscape. The scale of the Taylor Wimpey SUDs will overwhelm the area and potentially be an eyesore in its states of drying up. Presumably it will be fenced off for safety reasons, adding to the manmade unnatural look.

The Masterplan fails to adequately indicate how surface water drainage integrates with systems for existing properties and in particular to demonstrate that it will not cause flooding elsewhere.

The field to the north of Mushroom House and behind Alderwood Grove is boggy, with streams developing in high rainfall which run down into the the recess near the Bypass. In view of the massive construction works required with retaining structures and the nature of the clay soils, we have concerns that this will cause flooding elsewhere and will interfere with the current water surface drainage from existing properties. The plans do not indicate how surface water drainage integrates with those of existing systems.

There are no proper plans for drainage over the whole of the site. Presumably sewage and foul water will drain up hill into existing main drains on Market Street but no explanation is given as to how this will be achieved.

6) Implementation and Phasing

There is no commitment to a planned phasing.

There is no infrastructure delivery schedule.

The phasing is set out by landowner area but to suggest that the development may be reordered or delivered simultaneously would be totally unacceptable, given the size of the site and the constraints of location.

This does not meet the requirement of the Local Plan paragraph 1 of the site-specific Policy.

7) Construction

There is nothing in the Masterplan about the groundworks on the site and whether there are any specific actions required such as removal of land, levelling, the need for retaining structures, or extensive piling. Given the unstable nature of the land in the central site owned by Taylor Wimpey we would expect this to be a significant consideration.

Taylor Wimpey propose a mass of retaining walls in their planning application but there is no mention of this in the Masterplan.

Nuisance, disturbance and damage from building works

There will be significant ground works involved on site, including anticipated mass piling and these will cause major disruption to the community, and in particular the nearby residents, for many years. There is potential for damage to property as well as intolerable noise, dust and nuisance. Nothing is mentioned in the documents about this and how exactly it will be mitigated. This links to the need for proper phasing and a schedule.

8) Conservation / enhance the setting of the heritage assets and historic environment

ENV2 expects proposals to conserve or enhance where appropriate the historic environment of Rossendale.

The proposals do not demonstrate how the historic nature of the village and character and amenity are to be protected or enhanced.

The key characteristic of the core of the village is its narrow linear nature, surrounded by openness of fields with significant views to Holcombe Moor, Peel Tower, and Musbury Tor. This is an important historical aspect with links to agriculture which defines the village and gives it its sense of place in the valley and should be preserved. Filling in with mass housing on this sort of scale, density and height will be damaging to this special character of the village.

Views to certain historic landmarks will be lost adding to the loss of historic context.

Mushroom House, a non-listed heritage asset, will be overpowered by new properties, which will surround it, particularly those between it and Market Street which will blot out views to this farmhouse because of the height of the new build there. It should be given more space.

Similarly key views to Chatterton Hey, a non-listed heritage asset, will be lost being blocked by excessive dense housing. This is a significant view against the backdrop of the distant Holcombe Moor mass and Peel Tower.

Views to the Grade II* listed church will be impacted with a backdrop of the development clearly visible in winter. At night the backdrop will be disturbed with the myriad of street and house lights from the development.

There is no detail as to how the layout of housing parcels will achieve views to the church to continue. Similarly there is no detail as to what is involved in retention and strengthening of woodland to the north and south of the Church.

Design codes

Site Wide Codes and Area Type Codes

Scale, Layout, design, density and height of the development

We do not see how the Masterplan meets the requirements of the NPPF paragraphs 128 and 130, c and d for good design and fail to see how it will create a beautiful and distinctive place, sympathetic to the local character both of the surrounding built environment and the landscape setting and establish and maintain a strong sense of place.

The Places Matter Report is very critical of the proposals. It points out quite rightly that it is forgetting what makes the village attractive and shows a suburban attitude.

Edenfield is historically a ribbon development with key characteristics of significant open landscape, and visual effects, particularly in the central area of proposed development. The extensive open views across the valley and the accessible footpaths forming part of the network down into the valley and up onto the moors are important characteristics of the village. (Lives and Landscapes Assessment, dated 2015 (Local Plan Ref - Examination Library EB 025) Penny Bennett, Landscape Architect).

Edenfield's identity as a Lancashire village set in the foothills of the rural Pennines with distinct features of openness and visual amenity and with its historic, agricultural and rural nature will be severely damaged, impacting on residents' quality of life and stress on infrastructure.

The design and density of the site shown in the Masterplan and Design Code will have a major adverse impact on the identity of Edenfield and undermine its special character. It

would be dominant and overpowering and clearly does not meet the criteria of Strategic Policy SD2 which states that "the Council will expect that the design of development on the [site] minimises the impact on the character of the area...."

It does not meet certain requirements of other Local Plan Strategic Policies: ENV1, ENV2, ENV3.

It also does not meet the requirements of the Local Plan, Site-Specific policy H66 5v and 5vi

- Scale The scale of the development is inappropriate for this location, increasing the housing in the village by 50% and will permanently damage the character of the village. The disproportionate scale will be overbearing and dominate the landscape, visible from miles around, during the day and illuminated at night where it is now dark. There is a need to preserve the openness and key views which fix this village in the valley and are a significant part of its character and heritage. Numbers of houses should be drastically reduced.
- The suitability of site H66 for large scale development is still in question irrespective of the Council's initial housing allocation. As information from full investigations come to light the issue of suitability should be revisited. Already the developable land for the Taylor Wimpey area is reduced by 2.02 hectares which means the number of houses should also reduce.
- **Layout** Layout and Boundary Treatment Policy H66 5vi "Materials and boundary treatments should reflect the local context"
- The layout undermines the historic linear village core. The infill with mass housing disregards the landscape and character of the built form and will destroy the very thing that makes living in Edenfield so attractive. Properties are based around cul-de-sacs, maximising density. There is not enough green space throughout the site to soften the impact. Space around the houses is limited and does not allow key views. Allowing views only of distant hilltops as suggested in the Design Code is not acceptable.
- Roads on site are narrow allowing more housing to be squashed in leading to a concentrated mass housing appearance.
- The site entrance creates a distinct junction in the middle of Market Street, developing it into a feature which disrupts the village look. This area is poorly designed, with its combination of an arc of car parking, its protective mound and dominant housing, blocking Mushroom House
- The play areas are not ideally located. The one in the north west of the Taylor Wimpey site is not centrally located but above all, its sited next to the Bypass with obvious dangers as well as high noise and pollution levels
- The proposed play area in the North has limited access from the new site H66 given that it is reached only by crossing main roads and is also sited next to the proposed parking area. It is on land in Green Belt not covered by the Local Plan and not released.
- **Heights** properties are too high and disregard the local context i.e., the need for low level housing. 2.5 storeys are unacceptable having a more damaging impact, blocking

views and being overbearing. More single-storey is needed especially to meet the needs of the ageing population.

- too many high walls, fences, retaining walls, and acoustic barriers will also add to the chaos of blocking by hard landscapes.
- Densities -The densities described in the Area type Codes are totally unacceptable: 26

 30dph for Edenfield Core, 35 40 dph for 'village streets', 36 45 mph for Chatterton South, 30 34 dph for Edenfield North. These are not in line wit the Local Plan which states 29 dph. Densities on this scale are not in keeping with the village character and will not provide openness and visual amenity. The focus is too much on maximising densities at the expense of impact on the village.
- the developable land for Taylor Wimpey is now 2.02 hectares less than the Council's original figure which means the number of dwellings should also be reduced.
- The Masterplan does not protect the amenity of existing dwellings. Plans are
 insensitive to the needs of the community, particularly neighbours, in some areas of
 boundary treatment such as Market Street, Mushroom House and Alderwood Grove.
 Housing densities are at their highest 35- 45 dph in those areas and together with the
 parallel layout, back to back, has the most impact in terms of blocking and being
 oppressive and being overlooked.
- **Materials** there should be a predominance of natural stone which reflects the character of the village in this core rather than the overwhelming use of brick for houses which will be dominant and overbearing and which does not relate to the area. The use of more neutral colours would make it less dominant.
- In the central area owned by Taylor Wimpey, the approach is to use buildings clad in reconstituted stone around the face of the site, the more visually prominent areas, with red brick properties in the middle being 'hidden'. This is an acknowledgment that they are less visually attractive, yet they are deemed appropriate for existing residents to look out onto. It leads to differentiation in a negative way and is undesirable.
- Dry stone walls are a prominent feature and should be preserved. Some existing dry stone walls are not considered in the Masterplan such as at the entrance to the Taylor Wimpey Site and Alderwood Grove boundary. New dry stone walls should be used throughout the site. Reconstituted stone blocks and brick walls are not acceptable.

The Masterplan demonstrates, through its proposed designs, a disregard for the special character of the village, and the context that defines it: the openness, the significant views, its links with agricultural and historical roots.

This masterplan is too vague to be of any use and with so many significant issues not resolved, it should be rejected.

Karen and Richard Lester

Local Plan Policies

ENV1 - High quality development in the Borough

"New development in the Borough will be expected to take account of the character and appearance of the local area," -

ENV1b) Safeguarding and enhancing the built and historic environment;

ENV1 c) Being sympathetic to surrounding land uses and occupiers, and avoiding demonstrable harm to the amenities of the local area;"

ENV1 d "The scheme will not have an unacceptable adverse impact on neighbouring development by virtue of it being over-bearing or oppressive, overlooking, or resulting in an unacceptable loss of light;..."

ENV1i) Providing landscaping as an integral part of the development, protecting existing landscape features and natural assets, habitat creation, providing open space, appropriate boundary treatments and enhancing the public realm;

ENV1k) There is no adverse impact to the natural environment, biodiversity and green infrastructure unless suitable mitigation measures are proposed and the Council will seek biodiversity net gain consistent with the current national policy;

I) That proposals do not increase the risk of flooding on the site or elsewhere, where possible reducing the risk of flooding overall, having regard to the surface water drainage hierarchy;

ENV2 Historic Environment

The Council will support proposals which conserve or, where appropriate, enhance the historic environment of Rossendale

Policy ENV3: Landscape Character and Quality states:

"The distinctive landscape character of Rossendale, including large scale sweeping moorlands, pastures enclosed by dry stone walls, and stone built settlements contained in narrow valleys, will be protected and enhanced.

The Council will expect development proposals to conserve and, where possible, enhance the natural and built environment, its immediate and wider environment, and take opportunities for improving the distinctive qualities of the area and the way it functions.

Development proposals which are in scale and keeping with the landscape character, and which are appropriate to its surroundings in terms of siting, design, density, materials, and external appearance and landscaping will be supported.

In order to protect and enhance the character and quality of the landscape, development proposals should, where appropriate:

• Respond positively to the visual inter-relationship between the settlements and the surrounding hillsides and follow the contours of the site;

• Not have an unacceptable impact on skylines and roofscapes;

• Be built to a density which respects the character of the surrounding area with only low density development likely to be acceptable in areas abutting the Enclosed Upland or Moorland Fringe Landscape Character Areas;

• Retain existing watercourses, trees and green infrastructure features that make a positive

contribution to the character of the area;

• Incorporate native screen planting as a buffer to soften the edge of the building line in valley side locations;

• Take into account views into and from the site and surrounding area, retaining and, where possible, enhancing key views; and

• Retain and restore dry stone walls, vaccary stone flag walls and other boundary treatments which are particularly characteristic of Rossendale.

Development proposals should incorporate a high quality of landscape design, implementation and management as an integral part of the new development. Landscaping schemes should provide an appropriate landscape setting for the development and respect the character and distinctiveness of the local landscape."
Dear Sirs,

I write to object in the strongest possible terms to the proposed development of the land to the West of Market Street in Edenfield (H66) (planning application 2022/0451) ("the Masterplan")

I am a resident of Edenfield and live at 125 Market Street. The Masterplan will seriously impact me and my family in a number of ways which I propose to set out below;

Scale and Dominance of the Development

The vision of the Masterplan states that developers will seek to build homes that will *"compliment the positive characteristics of Edenfield"*.

The Masterplan seeks to add around 400 new homes to a village which already currently consists of around 900 homes.

Edenfield is a small village. To almost double its size is not seeking to compliment the positive characteristics it is seeking to over develop the village to maximise profit to the developer.

The Masterplan will dominate the landscape for a vast number of the current residents of the village which will severely diminish their enjoyment of their homes and local surroundings.

Parking

Parking is already an issue in Edenfield. There is already not enough parking. To add a further 400 homes would be crippling. In 2019 the national average was 1.2 cars per household. This means a further 480 cars are expected to vie for space on our already over populated streets.

It seems unconscionable to allow such a large influx of extra vehicles especially when the headline of the vision is "*Creating a characterful place people want to call home*". All the Masterplan seeks to create is a parking nightmare.

There is no possible way to make a car park characterful.

<u>Safety</u>

The influx of the additional cars will also heighten safety concerns on Market Street. As parents of two small children we already worry for our children's safety watching the current level of traffic and driving we see on the roads.

Market Street is already a busy street. From our front window we see every type of vehicle from push bikes all the way up to articulated lorries and everything in between. Additional traffic would only serve to put extra stress on a stretch of road which is already too small and unfit for purpose.

The highways proposal indicates a raft of parking restrictions along with requirements to widen narrow pavements, install parking bays and much more all directly in front of our house. How would you propose this might work on refuse collection day? It is impossible to foresee how vehicles would pass, not to mention the large amount of farming equipment continually requiring movement in the area.

Noise/Dust/Fumes

Environmental and health concerns must also be considered. The vision describes Edenfield as a *"countryside setting"*. If you consider the extra cars alone, this will put so much more pollution into the local area that it will fundamentally change the village and will no longer feel like countryside but more like an industrial town.

Most, if not all, of the residents of Edenfield will say they moved here for the fresher air, the peace and quiet, to be near the countryside and the character the village currently has. The Masterplan will destroy that, not only in the development and build stage but in the years beyond that. There will be no peace and quiet, there will be no fresher air, there will be no countryside.

It would be catastrophic to allow that to happen.

Layout and density of building

The Masterplan seeks to build houses close to the house I own. The development effectively envelopes my home. The space and freedom I currently feel I have at home with my family will be wiped out. The Masterplan suffocates my home and would entirely detract from the enjoyment I currently take from my home.

Character of the Area

My home was built in the 1800s. It has character. It is quirky and has some wonderful original features. It is in keeping with the character of the area because it helped forge that character. New build homes to that scale do not, and could not, enhance the character. It simply is not possible. I would suggest that by using cheaper, substitute materials to look like those used to build homes like mine only serve erode character and leave new houses looking like cheap imitations.

The Masterplan would end up looking like a cheap caricature.

Community Services

The building of 400 new homes is likely to see an increase in population of around 1000 people.

Edenfield doesn't have a local GP or dentist. Where is it proposed that all those extra people access basic health care? The additional people will impact on my family's access to healthcare which for my two children is a real worry.

There is one school in Edenfield. Whilst there is provision to increase the size of the school the impact on traffic and roads at busy periods will be monumental. The proposed increase to Edenfield school capacity is not a solution in itself. This is a religious school that would not be adequate for all new home owners. Also changing the school to beyond a one form entry is a fundamentally different concept and will have a damaging effect on existing pupils at this school.

I strongly oppose the Masterplan and the building of the extra homes around my home. Edenfield doesn't need 400 extra homes. Edenfield is beautiful small village and full of character the way it is. Allowing the Masterplan to proceed would absolutely ruin that.

Regards,

Daniel Rourke

Dear Sir/Madam

I write yet again to object to the Edenfield master plan and the Taylor Wimpey Planning Application to build 240+ houses to the west of Market Street.

Let me state from the start I am not a NIMBY. I am not against house building and the growth of Edenfield. I have lived in Edenfield for 44 years and have watched the slow and organic growth of the village. Edenfield is nice place to live and I can easily see and understand the attraction for builders and future residents. However the scale of the development and application by Taylor Wimpey is out of all proportion and will destroy the character and wellbeing of the village and the community.

Can I first of all state the obvious that this is or was Green Belt. We lose it at our peril. Once it is gone it's gone. They're not making any more of it. The land involved is where I take regular walks. Once built on to the scale envisaged I cannot see myself or anyone else using it as such.

By far and away the biggest concern about this development has to be traffic and also the impact on local services and amenities. Should this development go ahead as planned there would be a dramatic increase in the number of vehicles in the village. We can assume that 240 new houses could mean an additional 400 cars in Edenfield trying to navigate the already congested roads. Bury Road and Market Street is the main road through the village and there is already issues to do with resident and business parking and traffic flow. Has anyone actually carried out a thorough traffic assessment for them whole development site? With the extra 400 cars rush hours will be "mad" hours and the impact on safety and air quality has to be a serious consideration. We already have heavy lorry traffic relating to the quarry at Turn and Fletcher Bank, Shuttleworth. When there is an accident on the Edenfield by-pass traffic is often diverted through the village and, at times, causing chaos at the pinch points. We have also experienced this when road works and resurfacing work has taken place. With this dramatic increase in traffic and only limited options for direction of travel safety has to be an issue. We have a Primary School at one end of the village with children being dropped off/picked up or walked to/from school. The likelihood of an accident is greatly increased. There is already a bottleneck down at that end of the village. Very much in the news at the moment is air quality. This dramatic increase in vehicle numbers will see a detrimental rise in the amount of exhaust fumes, emissions and pollutants. What affect will this have on the young immature yet developing lungs of the children.

Part of the Plan envisages Exchange Street potentially becoming one way with possible yellow lines in order to facilitate traffic flow. What about the residents who already live there? The elderly? The infirm or disabled? Located down Exchange Street is "The Rec", a green space for use by any local residents but used a lot by children. There is also a cycle track and opposite a children's play area. With the increased traffic flow and proposed one way system this is an accident or accidents waiting to happen. The size and type of development is likely to see a rapid increase in the number of children in the village. Families with existing children or couples looking to add to the size of their family will mean greater demands on our local schools. Where are these children meant to go? Build an extra school or greatly expand the existing primary school provision? Edenfield Primary is successfully and oversubscribed. Its location means space is very limited and would actually require more Green Belt land to provide space for building the extra classrooms or to provide play areas. Stubbins Primary is in a similar situation. All these extra children would be drawn to the Rec, the cycle track and the play area greatly increasing the numbers and the likelihood of traffic accidents. Again, all those vehicles using Exchange Street will be producing noxious exhaust fumes in close proximity to large numbers of children. I believe part of Rossendale BC plan to aid traffic flow along Market Street is the excessive use of double yellow lines. This will have a serious and detrimental affect on local businesses and their customers. Of great importance is our local pharmacy and we are thankful to have one. We also have a high quality butchers, a hairdressers and also a Turkish barbershop. There is also a takeaway which relies upon passing trade and customers being able to collect their orders. I might also ask what on earth are the residents of Market Street meant to do with their car or cars. There is very limited space as it is, this will make a difficult situation impossible.

The environmental impact of this development cannot be overstated.the land as it is, being principally pasture for grazing is very good at helping with water flow. The fields absorb the rainfall and slowly let it percolate through and helps control flooding. This development consists of hard impervious surfaces requiring the installation of drainage for the water flow off all these surfaces. There will be little slow percolation of rainfall instead we will see a rapid flow of water into the drains with increased likelihood of flooding further down the system. The size of this development will also see a great increase in the amount of sewage and foul water entering the system. Once flushed out of sight, out of mind, yet it has to end up somewhere. Which treatment works and where? Will this add to the burden of the treatment works and cause even more sewage overflows into our rivers and streams. United Utilities has the worst record in the country with incidents of sewage overflows into our local rivers and streams. This is appalling and this development could well add to the problem.

There are numerous other issues I would like to raise. Demand on local services eg dental services already stretched to the point where people have difficulty finding an NHS dentist. A similar issue with finding a doctor. 240+ houses could mean 1000 extra potential patients for our already overstretched GP services. We do not have a GP or Dental surgery in the village therefore requiring more car journeys to satisfy that need. As typical of developments of this size density of housing is an issue. Hundreds of little boxes all looking just the same packed together a wheelie bin's width apart to cram as many as possible into the given space and at a price that few first time buyers or essential workers can afford.

Finally I might add that should this development go ahead then the whole of edenfield will appear to be one huge building site. Large industrial vehicles and earth moving equipment will need access to the site as will all the vehicles delivering building materials etc. In winter the surrounding roads will look like mud baths. Cars and pedestrians will get splattered with mud and the air filled with noxious fumes. Our road surfaces are already in poor condition due to neglect of the past ten years. All this extra heavy vehicle activity will only make matters worse.

Yours Faithfully

Paul Kelly

Sent from my iPad

9 August 2023

Dear Sir/Madam

Edenfield Masterplan/Taylor Wimpey Planning Application 2022/0451 Location: Land West of Market St, Edenfield Proposal: Full application for the erection of 238 no. residential dwellings and all associated works, including new access, landscaping and public open space.

I am writing in respect of the above planned development and wanted to make you aware of my strong objection to this.

The revised version of the masterplan does not represent all four developers, nor does it represent Rossendale Borough Council, it is a representation of what Taylor Wimpey wants. Given the severity of the proposal to Edenfield, I would have expected a unified plan to have been submitted.

The plan itself, again raises a number of concerns for me, especially that of safety. And fails to address those existing residents of Edenfield.

I live on Market Street, directly opposite the proposed entrance to the new site. Market Street is an incredibly busy road throughout the day and even in the evening often cars pass through, especially when the motorway is closed. To introduce over 400 houses with the entrance at this point is ludicrous.

I've bullet pointed my concerns below, please take time to read and digest.

- Firstly, no comprehensive masterplan covering the whole of H66 has been released by the developers.
- Another huge concern for me is the infrastructure. Even after many people voiced their concerns for lack of information on new schools, doctors, dentists have fallen on deaf ears. In Edenfield we have one school and no healthcare. With only one school in the area, it is unreasonable to expect Edenfield to take such a big increase in numbers of children. It is a small school with already large classes. This will result in larger classes and a lower standard of education. The surgeries in Ramsbottom & Rawtenstall is over-subscribed and barely surviving. If you want to see a dentist in the area we cant as they are already full and no longer taking on new residents. There are no proposals to open a new surgery. This means there will be more pressure on existing surgeries which I'm certain they cannot cope with.
- Safety Concerns Regarding the New Junction Entrance on Market St. The proposed site access on Market St as a new junction entrances raises serious safety concerns. Market St is already a highly trafficked road and serves as a National Highways Diversion route when the A56/M66 experiences closures. The safety measures proposed do not appear to be sufficient and may not meet the requirements for a development of the proposed scale. Insufficient visibility and the potential risk to the lives of residents, cyclists and primary school children (located just 250m from the junction) are of grave concern. The necessity of a road safety audit has been mentioned, yet it has been disregarded. By neglecting to address these safety concerns, Lancashire County Council and RBC may potentially breach their responsibility to ensure the safe day to day life of all residents in Edenfield. No site wide traffic assessment has been completed for the health and safety of all existing and new residents of Edenfield.

- Lack of detail regarding drainage, flooding. The rainwater that runs off scout moor across to the proposed development area is currently soaked in before it hits the A56. Once this Greenbelt land has been concreted over, what evidence is there to show that this will not affect the busy roads.
- The proposed one way system will now make a quiet road extremely busy, no safety measures have been considered for the play park directly next to the park, or the cyclists coming down from the pump track.
- Inadequate Crossing Points. The proposed plan includes only one crossing point on the north side of the junction, which raises serious safety concerns for the very young primary school children (including my own) crossing Market St from the south side. This lack of adequate crossing points poses a significant risk to their safety.
- Residents of market street opposite the proposed entrance to the site is where we currently leave our bins for collection. Currently there is no where else for these to go. There has been no consideration for where this could be relocated to.
- Future proofing, government is planning for all cars to be electric. How do you plan for people who can no longer park near their house to charge their vehicle.
- Double Yellow Lines and Accessibility for Current Residents. The introduction of double yellow lines in front of our houses raises concerns about us, current residents will access our properties with shopping and young children. The proposed compensatory car park is neither sufficiently large nor fit for purpose. A recent audit has identified between 35-40 cars parked every night, suggesting that the car park is open to new and existing residents, rendering it non-compensatory. Moreover, the lack of spaces for visitors, tradespeople and services, as well as the absence of electric charging points, further exacerbates the issue. Restrictions on parking will also negatively impact local businesses. This plan demonstrates discrimination against existing residents to accommodate the needs of residents in new houses.
- Discrimination against local existing residents of Edenfield, especially the frail and elderly by removing their parking from outside they're homes. In severe weather conditions they will now have to walk up to half a mile to get to their car.
- Removal of parking out side of shops will result in loss of trade and therefore foreclosure of these businesses.
- Guarantee spacing for existing residents either outside their homes or in new developments, whats to stop new residents of the proposed development park there once again discriminating against existing residents.

Surely a new development should fit into a small rural village, whether that be Edenfield or anywhere else in the country. Not the other way around, with Edenfield having to fit in to Taylor Wimpeys plans and to hell with everyone already settled in the village.

Surely there are more than enough reasons why this disastrous plan should be stopped for good, and the developers given more suitable land that wont destroy this beautiful village that is Edenfield.

I kindly request your acknowledgement of this objection.

I really do hope you listen to our concerns.

Regards

Morgan Edden

In respect of the above application, I make the following comments:

- 1. The Masterplan does not deal with the nature of development outside its own specific boundary nor does it provide details of phasing of implementation. It has not been approved by Rossendale Council, or involved input from all developers, therefore should not be considered a Masterplan.
- 2. The submission fails to address traffic and pedestrian safety concerns. There are 2 proposed junctions connecting to 30 MPH roads, both of which are heavily parked and therefore would have limited visibility. Although the introduction of double yellow lines aims to address this, what will be the impact for existing residents, their displaced vehicles creating more congestion on side roads and how will they access their properties with shopping and small children for example? Furthermore, the proposed parking restrictions would have would very likely result in reduced footfall to local businesses (butchers, bakery, pharmacy etc).

In addition these roads are heavily trafficked, even before introducing a significant increase in volume of vehicles the new housing would bring, these roads are a National Highways diversion route for any A56/M66 closure, often driving additional traffic through the village. Whenever this happens or there is even a minor issue or change to road access in the surrounding area, the impact is immediately felt in Edenfield. The tailbacks when such incidents occur are significant, not even just at peak travel times. The congestion and delays for travellers and residents, and in addition noise pollution will become a daily occurrence, and create a risk for emergency access.

Further, no road safety audit has taken place despite being raised as a concern previously.

- 3. The proposed release of further greenbelt to accommodate the extension of the School, a car park and a play area is not aligned with the Rossendale Council local plan. Not only will this cause significant disruption for the children currently attending these schools, but in the future would mean less outdoor space to accommodate more children, and add even more buildings to the village.
- 4. The submission fails to address the concerns of flood risk, particularly to the A56. SUDS too close to the A56 where there is already a known failure of embankment could reduce stability further and cause risk to road users.
- 5. The village does not have its own doctors surgery anymore nor a dentist and therefore would have to pull on these services from the surrounding areas. It is already increasingly difficult to get a doctor or dentist appointment for the existing residents of Edenfield, never mind before you add 400 additional houses with c1200 additional residents. These concerns have not been addressed.
- 6. As the development is removing green belt, the development is required to be well designed, make a positive contribution to the local environment, considering the character of the area and in accordance with the agreed design code. This proposal fails on all counts. This proposed development is overpowering, and with scale, density and character at total odds with the village and its environment. The illustrations appear to be a cut and paste of typical urban housing, which is dull and unimaginative and ignores many aspects of the design code, particularly in relation to building materials and style and character.

Victoria Giles ACMA

Morning,

I would like to object to the Edenfield Masterplan and Taylor Wimpey Planning Application, on the following grounds.

1. The Masterplan is not comprehensive and does not include the input of all the developers for site H66.

2. The traffic proposals have serious health and safety aspects surrounding the new junction for access to the Taylor Wimpey proposed 238 houses, the one way system on Exchange Street, the junction with Highfield Road and Exchange Street and the proposed access via The Drive, Highfield Road and Eden Avenue. All of theses have serious safety concerns.

3. There is no road safety audit completed it is therefore not clear whether the proposals would pass an audit.

4. There is no phasing proposal which means that the building can be undertaken simultaneously which leads to concerns over road and pedestrian safety.

5. There are proposals to release further greenbelt land for car parking but no indication whether this is for the use of existing residents or for new residents.

6. The proposal for the use of double yellow lines will affect both businesses and residents. Businesses will suffer a reduced footfall and residents will have their parking removed how will they access their properties with shopping, babies, children and what of disabled residents.

7. There is a flood risk overall but in particular on the A56 leading to serious traffic and public safety concerns.

8. There is active discrimination against existing residents in favour of new residents.

Chris and Adele Hanson

DJ Hancock Design

10th August 2023

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

The Edenfield Masterplan

We would like to make an objection to the Masterplan submitted by Taylor Wimpey for the Edenfield area.

We have recently submitted an application at Alderwood, Market Street, Edenfield. This is a site which is identified as Residential in the current Local Plan that will be developed, if approved.

Our application site is shown on the Masterplan submitted by Taylor Wimpey but no allocation is indicated for our site, this should be corrected. We therefore object to the current Taylor Wimpey proposals in the form presented.

The Alderwood site is the subject of a live application, number 2022/0577, it is being considered by the Council at the present. The proposals are for seven detached and two semi detached properties. To this end some reference to the proposals would be appropriate.

Yours sincerely David Hancock

To Rossendale planning department,

I am objecting to building on the green fields of our village for many reasons, especially green belt should never be touched when we have brownfield sites available and multiple empty homes in the Rossendale valley as it is.

There is no master plan in place, the amount of green belt removed is far too great for the village and the traffic plan that's been put forward is unacceptable.

Building over 400 houses will bring at the very least double that in vehicles, for example, there's 3 people in our home with 4 vehicles, soon to be 5 vehicles when my son is qualified and gets his work van. The removal of on street parking for many residents will be detrimental to those people especially the elderly and those with children, having to carry children and heavy shopping bags some distance to their homes. Why should we be discriminated against? How are those homeowners supposed to charge their electric vehicles which we have, we all will have in the very near future? The new car parks proposed by the developers need yet more greenbelt that's hasn't been released and can current residents be guaranteed a parking space after their on street provision has been taken?

The businesses in Edenfield will suffer if the proposed changes to the highway happen as no stopping means no shopping, people will just go elsewhere forcing closure.

The changes to Exchange st, one way, and the use of Eden avenue, Highfield road and the Drive as a means for traffic to enter and exit the new builds will be hazardous for residents and children especially, as the recreation ground, the children's park, the community centre and the new pump track are all at this junction and were never built to cope with an amount of traffic that is currently completely unknown and grossly underestimated by the developers.

The land at the bottom of Exchange st owned by the Methodist church, the back field as we know it, has never been farm land, agricultural, never been grazed upon, I have had access to that field for over 30 years, walking dogs, exercising, my children have too as have many residents for years greater than my own, a quick look at the land registry shows a natural spring underneath and pathways, this land should be removed from any development plans and left to nature as it has been for years and classed as common land for all to appreciate.

Mrs Annabelle Lumb

Sent from my iPad

Hi,

I would like to object to the Edenfield Masterplan/Taylor Wimpey Planning Application 2022/0451. This is based on the following points:-

1. The proposed car park at the northern end of the village next to the school would further release of green belt land which is not part of the Rossendale local plan. This would also be likely to cause further traffic and road safety problems as it is so close to the traffic lights, and the junction with Blackburn / Burnley roads.

2. The proposals to introduce double yellow lines along significant parts of Market street discriminates against existing residents and the proposed parking areas would not compensate for this as they would not be big enough to allow for the number of cars currently parked on Market street. Additionally, commercial businesses along Market street are likely to suffer significantly due to the lack of parking and this is likely to have a serious affect on the local economy.

3. The southern part of the village, where the Anwyl development is, has serious road traffic/safety implications. Making Exchange street one way would seem to be an acknowledgment of the problems caused by the scale of the development and therefore the number of vehicles needing to travel along there if it was left as it is. However, such a proposal is merely moving the problem along Highfield rd, Eden Avenue, The Drive.

The plan does not show how such a massive increase in traffic can be safely managed along these small, narrow already double parked residential streets.

The plan does not suggest any mitigating measures for this part of the village and there are likely to be serious traffic / safety issues as vehicles try to enter/exit the development site from Bury rd and Bolton Rd North. The junction of The Drive with Bury rd is very close to another major, very busy junction; Bolton rd North and serious traffic congestion/ accidents are likely.

Bury rd, south from the junction with Bolton Rd North is already heavily double parked and a major pinch point for traffic with regular congestion along this road, so the proposed plans can only make this worse and cause serious access/grid lock situations (this is already in evidence whenever there is any kind of accident on the A56 bypass as Edenfield becomes a diversionary route to/from the northern part of the Rossendale Valley.

4. Overall, the scale of the development in terms of the land area being built on and the number of houses is excessive and out of proportion with the existing size of the village (increasing the number of houses by around 40%). The density of the proposed houses is also too high and the design/appearance of the houses, particularly in the Taylor Wimpey plot is poor and unsuited to the village.

Regards,

Mark Tweedale

Sent from my iPad

Hi,

I would like to email to say that I am completely against the new Edenfield Taylor wimpy new builds in Edenfiled.

Starting with the destruction of the geeen belt and everything that makes Edenfield the "desired" place to live.

There is no adequate parking for the new builds, the road on market street will be changed to double yellows with no parking options provided for the residents.

Thee traffic is backed up most evenings as it is never mind adding hundreds more cars on the road. The schools are nutritiously hard to get into and by adding the new houses this will only increase this issue ten fold.

They are no proposed shops to help build our community's village as they are building its population. There is no aduqute plans for replacing the green space that they are going to now destroy. Thanks.

Eliesse.

Adrian Maddocks

Objections to H66 development plan

Increased traffic on market street. Reduction of existing parking on market. Disabled and well bodied will struggle with shopping and other daily duties. They have parked outside their houses for years so what right does Rossendale BC have to remove that purely for the benefit of others. Land drainage - where do they expect the water to drain off to, the bypass or even worse the valley floor and the river? Whilst there are brownfield sites in Edenfield there is no excuse to build on fields.

Regards, Adrian

> Objections to H66 development plan

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> Increased traffic on market street. Reduction of existing parking on market. Disabled and well bodied will struggle with shopping and other daily duties. They have parked outside their houses for years so what right does Rossendale BC have to remove that purely for the benefit of others.
 > Land drainage - where do they expect the water to drain off to, the bypass or even worse the valley floor and the river causing flooding to areas which are already at high risk of flooding.
 > Whilst there are brownfield sites in Edenfield there is no excuse to build on fields.

> > Regards, Joanne Maddocks >

Proposed release of greenbelt to accommodate car park, play area and school extension – the car park were not included in the Rossendale adopted local plan. To approve these proposals would set a precedent for the Council to remove further areas of green belt land at will within Edenfield. Have we no lost enough already!

2 Additional new proposed junctions – resulting in 8 junctions concentrated in one very small area, all entering from a 30 mph Zone and exiting onto a 30mph zone – limited visibility – serious safety concerns for pedestrians (including primary school children), cyclists and traffic overall Gateway proposed– location seems dangerous, misrepresents the start/exit of the village, is unlikely to have an effect on road/pedestrian safety due to size of development/increase in traffic, A56 being closed recently has highlighted this, and traffic diverted ignoring traffic calming measures and they have not been enforced Double yellow lines in front of houses – how will residents access properties with shopping, babies and children etc.

Uncontrolled crossing at school- not wide enough from a pedestrian safety perspective, how will children be supervised crossing – serious child safety concerns No crossings on Blackburn Road and Burnley Road – serious safety concerns of existing residents and residents from the proposed Peel/Northstone developments crossing road, particularly relevant for children walking to school who are our most vulnerable and also people with disability Cycle path from central (core of the village as in masterplan) does appear not link to cycle path North of village, Church Lane– hence is not fit for purpose

OVERARCHING CONCERNS FOR EDENFIELD to

Dear sir / madam,

I am emailing to put in writing my objection to the Edenfield master plan.

I oppose the plan for the following reasons:

1. The village roads cannot cope with an increase in traffic. There is not enough parking as it Is and the small village road (market street) is regularly congested. Another 400 homes will make this worse.

2. The village does not need more housing. There are plenty of houses here already. The new development off Rochdale Road is undersubscribed. The developers there have not sold the houses they have built. There are plenty of houses on the market without buyers.

3. The community already struggle with school / doctor /, dentist facilities. Where are the additional services being provides for a possible another 400 families.

4. The disruption it will cause to current residents on Market Street will be horrendous for them.

5. The most important reason I object to the plan is you are propsing to build on land that is GREENBELT land. We need our green spaces. We cannot lose any more

I really hope you take the time to actually consider what the residents want and need in THEIR own community.

Thank you for reading. Mrs Michelle Jarvis

To Rossendale planning department

I am writing to object to the developments planned for the village of Edenfield. The reasons for this are, climate change and loss of greenbelt, the flood risk not only of lower down in The Valley but of lower down the river Irwell into boroughs of Greater Manchester.

Traffic, the Rossendale valley consists of what once were mill towns, established many years before the motor car. The roads we have struggle to cope with the traffic we have now, I listen to the traffic reports on Rossendale radio daily, everywhere is getting

worse. Edenfield Market street is not only residential it is also a major thoroughfare in and out of The Valley, this is shown when the Rawtenstall bypass is closed which has been happening frequently then Edenfield becomes gridlocked and we dare not go out as we'll be stuck in traffic trying to get home just adding to the problem.

I have also seen posts on social media of people asking how to get their children into Rossendale schools as there are no places.

Before any more developments happen in the Rossendale area infrastructure must be put in place, schools, doctors, dentists too.

John Lumb

To whom it may concern,

In relation to planning application 2022/0451 and Edenfield Masterplan.

As a resident of Exchange Street, which is a street proposed to be majorly affected by the revised plan, I wish to object to this application and to the masterplan. I understand the need for more housing nationally, and therefore locally within Rossendale and Edenfield. However, with the scale of the plan, given there are approximately just over 1000 houses currently in Edenfield - the full development would increase the number by approximately 45%. I feel that the number of houses proposed is too large for a small village.

I object with the following rationale -

The proposed plan lacks a comprehensive masterplan and hasn't been approved by RBC or all developers. I'm of the understanding that the master plan must include views/proposals of all developers involved, and this represents only Taylor Wimpeys views.

Increased traffic is a huge concern, along with pedestrian safety. Market Street is a main road carrying a high volume of traffic for a residential area, due to the access links from Rawtenstall (and surrounding areas) to A56/M66 and vice versa. I believe that there has been no site-wide traffic or road safety assessment to assess the potential impact of the volume if further homes proposed.

The infrastructure needs, including schools and healthcare, are unaddressed. I believe that a potential plan is for one of the two existing local primary schools to be extended with further places, and physically extended. I don't feel that one school expanding could accommodate the amount of children that could be living in all of the family homes proposed. In addition, it is proposed that further greenbelt land would be used to extend the school. There is GP surgery or dentist in the village, and only one general store.

The design codes of the Neighbourhood Plan and landscaping are given minimal consideration, therefore, would not be inkeeping with the existing aesthetic of the village.

I am concerned about an increased flood risk. SUDS near the A56 appears to not be taken into account.

Some residents of Market Street and Exchange Street will have restrictions on parking due to double yellow lines. There does not appear to be enough alternative parking spaces offered, and those proposed are too far away from the homes for elderly bringing shopping bags and families safely getting their young children from car to home and vice versa. Local businesses will be impacted by the proposed parking restrictions along Market Street and Exchange Street. From talking to local business owners, many of their customers do travel from outside of the village, and rely on delivery vehicles being able to park close to their premises. Anwyl have proposed off-street parking at the bottom of Exchange Street which will not serve any purpose to my points.

I am also concerned about the volume of traffic proposed to be flowing around the junction of Exchange Street/Highfield Road. One-way traffic from the top of Exchange Street, bearing left into Highfield Road, along with traffic to and from the proposed site of the Anwyl homes turning into Highfield Road, leads to a potentially heavily congested area, where there is the

pump track with direct access to the main road, an entrance to the children's play area and a rec ground all directly next to this junction.

Road safety for the amount of children that utilise these three areas is very concerning. Highfield Road itself is a narrow road with housing along both sides and is usually doubleparked. The amount of traffic that could travel along here would raise significantly.

My elderly mother lives on Highfield Road in a housing association flat complex for 'over 55s', and there are several residents within the 12 flats with mobility issues. I am concerned about the increased traffic and their road safety.

Please could my objection be considered.

Yours sincerely,

Fiona Keir

Adam Leeming

10/08/2023

Planning Department Rossendale Borough Council Futures Park Bacup OL13 OBB

Subject: Strong Objection to Taylor Wimpey's Master Plan for 238 New Houses off Market Street, Edenfield

Dear Sir/Madam,

I am writing to formally lodge my objection to the proposed master plan presented by Taylor Wimpey for the construction of 238 new houses off Market Street in Edenfield. I appreciate the importance of balanced development, but I believe that this particular proposal raises several critical concerns that must be addressed before any approval is granted.

I object to the application based on the following grounds:

Inadequate Infrastructure: Edenfield's existing infrastructure is simply inadequate to accommodate the scale of development proposed. The current state of the roads is already a point of concern, particularly when the village has to bear the brunt of redirected motorway traffic. The presence of regular traffic jams throughout the night underscores the fact that the road capacity is already stretched to its limits. The addition of 238 new households would only intensify these issues, causing more congestion and potential danger to the public.

Insufficient Traffic Management Measures: While Taylor Wimpey's proposed solutions include building a car park at the road's end and implementing double yellow lines along Market Street, these measures are far from adequate. Such solutions disregard the needs of households with young children and prams, who would now be forced to navigate a busy road to access their homes. This situation will undoubtedly lead to increased stress and danger. Additionally, elderly residents, who may find it challenging to park further away from their homes, will face considerable distress. Furthermore, the removal of parking spaces could also negatively impact residents with electric vehicles, who will be unable to conveniently charge their cars. Environmental Concerns: The proposed development would likely introduce additional pollution to the village, affecting the health and well-being of its residents. Increased traffic and construction activities can contribute to higher levels of noise, air, and water pollution, potentially causing health issues and diminishing the quality of life for Edenfield's residents.

Pedestrian and Cyclist Safety: The presence of 238 new households would likely bring a surge in traffic, making it more hazardous for children to walk or cycle to school. The increased road activity could create a more dangerous environment for young pedestrians and cyclists, potentially compromising their safety.

In light of these compelling concerns, I urgently request that the Rossendale Borough Council Planning Department reevaluates the proposal put forth by Taylor Wimpey for the development off Market Street. It is imperative that a comprehensive assessment of the traffic impact, potential environmental consequences, and safety implications for pedestrians and cyclists be conducted before any decision is made.

I strongly believe that the Council must prioritise the well-being, safety, and comfort of the existing community above all else. Development should be carried out responsibly, with careful attention to the concerns and needs of the residents who will be directly affected.

Thank you for considering my objections to this development application. I earnestly urge the Rossendale Borough Council to give due consideration to these concerns and make a decision that reflects the best interests of the Edenfield community.

Yours sincerely,

Adam Leeming

Michelle Smith

9th August 2023

Subject: Objection to Proposed Housing Development in Edenfield Village. Application 2022/0451

Dear Sir/Madam,

I am writing this letter to express my strong objection to the proposed housing development in Edenfield. While I understand the need for housing in our community, there are several critical concerns that need to be addressed before moving forward with this development.

Firstly, my primary concern is the lack of a comprehensive masterplan that includes input from all developers involved. It is essential that a well-coordinated and integrated plan is developed, taking into account the needs and perspectives of all stakeholders. This will ensure the sustainable development of the area and prevent haphazard construction that may lead to long-term negative consequences for the community.

Furthermore, the proposed new junction raises serious concerns regarding safety and suitability. Based on the available information, it appears that the new junction is unsafe and not fit for its intended purpose. The potential risks to both vehicular and pedestrian traffic are alarming, and I urge you to conduct a thorough assessment of the proposed junction's design and safety measures before proceeding.

In addition to the junction, I would like to highlight the overarching traffic, cycling, and pedestrian safety concerns associated with this development. The existing infrastructure in the area is ill-equipped to handle the influx of additional traffic, posing significant risks to the community's safety. Despite these concerns being raised, it is alarming to note the absence of a road safety audit. I implore you to prioritize the safety of the residents and conduct a thorough road safety audit to identify and mitigate potential hazards.

Furthermore, the implementation of double yellow lines and parking restrictions in the area will undoubtedly have a negative effect on local businesses and current residents including myself. As a resident and parent of young children, I am deeply concerned about the implications of these restrictions. It is essential that we have the ability to park outside our homes safely, without the added burden of carrying groceries or other items across busy roads. Moreover, such parking restrictions will severely inconvenience our friends and family who visit us, potentially discouraging them from coming to the area. It is vital that the needs of both existing and future residents are accommodated in a fair and equitable manner, without discriminating against any particular group.

Lastly, I must bring to your attention the issue of flood risk, which poses a serious threat to both traffic and public safety in the area. Particularly, the A56 road is susceptible to flooding, and the proposed housing development will only exacerbate the situation. The potential consequences of increased traffic and flood risk demand immediate attention and action to ensure the well-being of the community.

In light of these concerns, I respectfully request that you reconsider and address the issues mentioned before proceeding with the housing development. I believe that by working together and considering the perspectives and needs of all stakeholders, we can achieve a sustainable and safe outcome that benefits the entire community.

Thank you for your attention to this matter. I look forward to receiving your response and hope that our concerns will be given due consideration.

Yours sincerely,

Michelle Smith

Good evening,

I write in respect of the Edenfield Masterplan/Taylor Wimpey Planning Application 2022/0451.

I've looked at Taylor Wimpey's proposed "Highway improvement measures" following their "traffic assessment" - firstly, I cannot fathom how anyone can possibly accept these measures as an improvement - I was utterly shocked to see that their idea of an improvement was just as obnoxious as discovering that 400+ houses were indeed regarded a good idea for this small village.

It's asif these people have never visited this village.

Restrictions to parking outside the shops for the entire hours most of these shops are open? -It's not rocket science to know that is detrimental to these businesses. Also, what about the residents that live on Market Street? Oh, they want to build a car park to help with parking... at the other end of the village and on the only roadside field that would be left!! On that note, has anyone looked at that field when it rains? The water that comes from the hills behind is already a huge issue to the residents of Burnley Road and can be witnessed on that field where streams develop from the enormity of the volume of water.. which then floods the roads and completely overwhelms the inadequate drainage.

The traffic that these "improvements" would cause for the poor families of Highfield Road, Eden Avenue and The Drive is beyond acceptable. It will be gridlock throughout the village with an impact on surrounding areas - Rossendale and Ramsbottom do not need further traffic problems!

How has this been allowed to happen? How has it already gotten this far? There are so many brownfield areas with good potential across the valley, and yet here we are, fighting to keep a horrendous amount of houses not just in a small village that will irreparably and immeasurably destroy this village, but the entire plan on greenbelt land.

I pray that common sense prevails, quickly, and the magnitude of this disastrous build is diminished. The people and wildlife of Edenfield, and surrounding areas deserve better.

Regards,

Donna Cryer

Good Evening.

I have been trying to Lodge my object to the Edenfield Masterplan H66 for the construction of new housing in previously green belt land.

The web portal is not working.

I have been an Edenfield resident for over 20 years now and have raised both my Children in the Village.

I have serious concerns over the validity of the planning and the impact on the local community and surrounding area.

Please take this email as my official object to the current proposed planning.

Kind Regards Julian Butterworth

To RBC

Please regard this email as my OBJECTION to the Masterplan and Taylor Wimpey planning application 2022/0451 as stated in email subject.

The website is unavailable and showing server error to submit my objection so I am hoping this is acceptable. I fully agree with the objection and the reasons for this submitted by Edenfield Community Neighbourhood Forum. I am particularly concerned in relation to the ability of the village to accommodate the increase in traffic volume, parking availability, road safety and access and exit routes. The closure of the A56/M66 as required presently to support road maintenance already clearly illustrates the inadequacy of the existing highway routes/ infrastructure within Edenfield to accommodate any increase in traffic volume. The other obvious concerns regarding environmental impact including flood risk, lack of adequate public services(eg.medical,dental,education) lack of agreed phasing in plan for building, lack of green spaces have been raised within the ECNF objection and again I fully support.

Susan Crook

Dear Sir/Madam,

I am writing to object to the plans for development across Edenfield. Please see below;

1) Environmental

The developments will take much of the existing green areas and transform them into houses. There are very few greens areas left and removing these are very detrimental. This will have a massive impact on the wildlife within the area, meaning a loss of habitats and feeding grounds

2) Pollution

Due to the increased number of cars the development will bring to Edenfield, this will inevitably increase the number of cars. Due to a lack of public transport infrastructure in place, residents will have to rely on their cars for commuting. As they will be in a more rural setting, this increases the distance and thus air pollution in order to travel. Until a more robust public transport system is in place, it seems impossible for not just Edenfield but the local communities to accommodate this number of extra residents.

3)Parking

Due to the plans in place to make Edenfield manage with the extra traffic, it appears that local residents will have to rely on car parks. The placement of the car parks is questionable as they appear to be next to the primary school and also the children's playground. It seems very poorly thought through to have car parks placed in such close locations to areas where children will be very high. This is considering the pollution concerns as well as the traffic and risk to life that would be brought about.

4) Traffic flow

Due to the potential increase in cars, there are a number of proposed traffic flow changes. One of these is down Exchange Street. My concerns around this are the fact it will become a rat run, especially heightening concerns that this will be right outside the children's playground and pump track. I would have concerns for child safety due to parking along this road for residents mixed with increased traffic due to the development.

5) Positioning of houses

It appears that houses will be three storey in some places and will overshadow some of the existing properties. This will cause an increase light pollution and energy costs due to the houses (partially Alderwood Grove), being in the shadow of new properties.

6) General traffic

It seems implausible that Edenfield can manage any further traffic without a much more robust public transport system and road system being put in place. Edenfield struggles to manage with the traffic levels at present. Any increase on the infrastructure will not be sustainable.

7) Public safety

Due to the proposed traffic measures through the village, I suspect that this may increase the flow of traffic through the village where possible, however this is at the detriment to footpaths. Due to Edenfield Primary school having to take on extra pupils, there will be an increase in the number of cars within the village. Due to the footpaths being altered to

accommodate this extra traffic this is of a concern for the safety of pedestrians, especially children

Thank you for your time,

Kind regards

Liz Lawton.

Sent from Outlook for Android

Hello I wish to object to the H66 plans

No consideration for existing residents of the village, especially in the surrounding area

Objections 1) no agreed comprehension master plan for the whole site 2) serious traffic, cycle and pedestrians safety concerns 2) no traffic assessment for the whole site 3) no road safety audit 4) increased traffic and congestion without any consideration to the impact of the village

Lastly Why

Justify the demand And why such a percentage influx in Edenfield compared to the surrounding areas

C Edwards

Hello,

I would like to object to the above plan on the following grounds.

- 1. We have seen no agreed masterplan for the whole site this is just one of the 4 applications. How can an informed decision be made without this.
- 2. Serious traffic, cycle and pedestrian safety concerns. The whole of Edenfield will be impacted, Market street is already a virtual one way road. There has been no whole site assessment once again and no road safety audit. Highfield Road and Eden Avenue will become a rat run with cars already parked on the road it will be very dangerous for residents especially children.
- 3. Phasing of building work has not been addressed access is already restricted.
- 4. Infrastructure for the additional houses and people has been ignored. School places, healthcare public transport not been thought about.
- 5. Design codes in the neighbourhood plan from ECNF has been given hardly any consideration.
- 6. Taylor Wimpey development is cramped, this shows no consideration by TW for the good of the village or even the new houses they are building only profit.
- 7. Flood risk has been ignored and the position of SUDS near the main A56 is a serious risk. There is currently considerable water run off on the road currently.
- 8. Concerns over the equality impact of the development. People will not be able to park outside their own houses. Some of those are frail, at risk and disabled. This will also have an impact on the value of property.
- 9. Parking restrictions will have a negative impact on local businesses.
- 10. Proposed further release of greenbelt to suit the developer. Where will this stop.

Surely anyone can see this is an unsuitable site for the level of housing proposed.

Regards, Simon Edwards.

Dear sirs,

In response to the amended TW master plan.

The document still falls a long way short of fulfilling the requirements needed by the community to have this 50% population expansion feel anywhere near positive and acceptable or even thought out. It is clearly nothing more than sticking plaster solutions to an ill conceived proposal, and the massively obvious issues it throws up still don't feel planned or mitigated for.

In addition in the opinions of every single resident I've chatted about it there is overwhelming feeling that falls well short of not just ours but your own expectations that you wrote into your own local plan. And reading the last rounds objections and noting the limited changes since then - LCC's highway expectations and almost every stakeholder and consultantee involved in the process so far! There is just not enough information and what is supplied is at best vague and speculative.

In the north end of H66 - who on earth would see the loss of the community's last visible roadside Greenbelt as exceptional circumstance? When the reality is that the whole car park idea is merely a solution to a problem caused by the original loss of Greenbelt in last huge rezoning in the local plan In the first place! It's just so there can be a big junction on Blackburn rd. Crazy. . It would be a travesty if that was allowed.

It would further encourage parents to drive the kids to school A) for convenience B) because the amount of new extra (very busy at peak) junctions caused by the proposed developments would render parents anxiety to be even higher than it already is. When it comes to road safety and exercise choice it should be known that parents worry a lot about the state of traffic on the roads and junctions kids need to cross. It is afterall a corridor village in a very busy main road. I feel our kids deserve better especially given the child obesity explosion the country faces. It would be very small minded planning if this master plan was allowed to be passed.

The TW junction appears dangerous, forcing residents to park some distance away from their homes and being forced to cross at a now complicated high used junction. This is also the route to school for a great many pupils at our village school just 500m down the road. Where do the rights of residents not to suffer a loss of life quality come into play?

The main reason that the proposed masterplan fails is that it's incomplete. It does not deal with the Methodist (southern) end of H66.

How is the traffic to move through highfield rd or past the park and cycle track? How is it to connect to the main roads?

The information actually provided is highly problematic but the volume of basic information that's missing but so obviously needed to form a comprehensive joined up master plan is huge and to accept it as anything like a blueprint for 50% housing growth going forward is totally unacceptable. The area deserves better.

These proposals are potentially dangerous to pedestrians and cyclists.

Rossendale promotes itself as a cycling hub. We have a very well used cycling gateway hub in Edenfield in the form of 'the drop off cafe' we need proper provision for cyclists crossing points for our children we need cycle lanes not bottlenecks and dodgy junctions.

TW planning application-

Without a master plan that supports these developments as a whole as clearly promised in the local plan then as the wording indicates no planning application can be passed.

However, as your own design consultants have previously concluded this design is very poor. The materials, layout, density, surface water management scheme, lack of additional value in play facilities, green space, connectivity for cyclists / pedestrians or otherwise. There is no value for the wider community whatsoever. It is very poor.

Best

Martin Dearden

I wish to send my objection to the masterplan by Taylor Wimpey.

I am strongly against the plan for what will eventually be 400 houses. Again this plan hasn't been put through as one plan for the 400 houses and has been split and doesn't give a true impact on the village.

Traffic is already a problem in Edenfield, Market street in particular has now been reduced to single file traffic nearer to the mini roundabout due to high traffic. Double yellow lines isn't a solution to this, why should existing residents be impacted in such a negative way? I would like to ask the planners, if this was their house, would they be happy to lose their parking which some people have had for nearly 30 years?

Market street and all the way onto Burnley Road is used like a race track already, the on road parking somewhat acts as traffic calming. Removing this parking will only make this problem worse and I have great concerns over the safety of residents who already live here. In that respect you would need something like an average speed check to counter this.

Flood risk is also another worry, take a trip along the A56 and you see numerous signs stating "road liable to flooding". Building houses adjacent to this section of road will only increase water onto this already terrible section of road.

Take a look over the last 18 months at how many overnight motorway road closures (one for 2 and a half months) along the A56 have resulted in Large volumes of traffic, especially lorries being diverted through a small village that cannot cope with this type of traffic. This has personally caused damage to my property due to HGV's passing in Large amounts.

Dentists, doctors and lack of school places have not been catered for in this plan either.

What will the impact be on utilities? Will infrastructure be upgraded?

Residents of the village and visitors to the area will know of the large amounts of wildlife in the area, this year in particular large volumes of deer can be seen. Removing greenbelt and animal habitats can only have a negative impact on what wildlife we have here.

I think people can understand the need for houses, but such a high quantity in a village which would nearly double the size of Edenfield is ludicrous. I can only come up with one answer as to why Edenfield has recieved such a large allocation of houses compared to other areas in rossendale and that can only be greed!

Thankyou Darrell

Feedback on Revised Masterplan and Design Code for Edenfield/Market Street and Taylor Wimpey Planning Application 2022/0451

Date: 9th August 2023

Name: Stephen Wilson

Address:

Overall I am very concerned about the proposed and revised Edenfield Masterplan and Taylor Wimpey Planning Application 2022/0451 and raise my objections to both below: -

The changes made to the Masterplan are still not sufficient, as it is not a comprehensive Masterplan as promised in the Rossendale Borough Council Local Plan. Despite the amendments all developers have not been involved in writing the plan, hence it is a Taylor Wimpey Masterplan only, and lots of assumptions made with regards to development of land not owned by Taylor Wimpey and with regards to the road structure in Edenfield in the future. It also takes no account of the needs of existing residents in the village.

Of particular concern are of both the Masterplan and Taylor Wimpey Planning Application are:

- Phasing I am very concerned that there is no definite plan re phasing and that simultaneous development is mentioned of all developers. This would lead to severe disruption across the whole of Edenfield and also road safety concerns during the development. Particularly for me as my road of Exchange Street is accessed by Market Street and would also be a main access road to the Anwyl Land I am very concerned about the phasing for this, as there is such limited detail available.
- Traffic assessment my concern is that whilst changes are proposed to the road system in the North, Central and South of Edenfield there is only a Traffic Assessment for the Taylor Wimpey site, despite there being so many safety concerns of the new proposed road system as a whole:
 - Due to the massive change in the road system proposed a traffic assessment of the whole site should be undertaken and not done piece meal by each developer
 - Taylor Wimpey's traffic assessment is based on predicted 2030 data, it should be based on at least 2040 predicted data as the building work is likely to be ongoing beyond 2030. Also they have based their assessment on post Covid levels as they state this is quieter, we know traffic is gradually increasing again and hence data should be based on the busiest pre Covid assessment to be realistic for the future
 - Increased junctions leading on to Market Street, which isn't wide enough to accommodate the junctions proposed, will like lead to increased risk of accidents and safety risk to pedestrians, especially as the market street corridor is used by some of our most vulnerable, particularly young children who walk to school
 - There is no mention of the Cycle Pump track on Exchange Street, which is directly opposite the proposed junction of Highfield Road and Exchange Street, and at the access road to the Anwyl land, this potentially puts the safety and lives of children who use the track at risk as they enter/exit the pump track. It should be noted that traffic on Exchange Street has increased significantly due to the pump track, as people from across Rossendale and Bury/Ramsbottom drive to the track for their children to access it, children also ride themselves to the track resulting in more cyclist on access roads as well as Exchange street, including Market Street, Highfield road, Bolton Road North and Bury Road
 - The proposed use of Exchange Street as a one way access road to the Anwyl Land. The left turn onto Exchange Street is a blind turn due to the limited width of the junction. This poses serious safety concerns for pedestrians crossing the road at the Market Street, Exchange street entrance and also people on the footpaths on Exchange Street which are already very narrow. I already witness several accidents at this junction

- The use of Highfield Road and The Drive as access roads, there are already issues with this access with double parking, children play on this road and visibility is limited due to double parked cars. This will be exacerbated further with an increase in traffic
- There is no road safety audit -overall due to the number of concerns by myself and other residents, a road safety audit should be completed
- Parking Restrictions I am very concerned about the parking restrictions proposed for the village, personally this will displace me parking outside my own home. I have a son with a learning disability who lives with me part of the week and one of the reasons I bought the house was the ease of parking outside directly outside. The proposed compensatory parking on the Anwyl land is a significant distance from my house at the Market Street end of Exchange Street which would cause him anxiety, he also has hearing problems so to walk from the car park with increased traffic on the roads would potentially put his safety at risk. Also I am concerned what effect the proposed parking restrictions across the village would have on local businesses as I'm aware that people come from outside the village to access the shops, pharmacy, cafes and park on the streets. If this parking isn't available it could significantly reduce footfall to the shops resulting in closure. I rely heavily on the shops for my local groceries, medicine supplies etc.
- Concerns over the equality impact of the proposed development as detailed in the Masterplan and Taylor Wimpey planning – all measures are geared towards the development of the H66 site at the detriment of existing residents resulting in direct and indirect discrimination. Current residents, including myself, are being displaced from parking outside their homes, some of whom have protected characteristics e.g. disabled, frail, have learning disabilities as in my sons case, people with young children, people who are pregnant, yet priority is being given to the rights of residents who will live in the new developments e.g. disability access, width of driveways, parking outside their homes being a priority. This is wrong and hence the Masterplan and proposals should be subject to an equality impact assessment that reviews and ensures equal rights for both existing residents and new residents who will live in the development
- Concerns over compensatory car parks not being sufficient I am very concerned about the
 proposed compensatory parking as I don't believe them to be adequate and of sufficient
 number for the amount of parking being displaced. It's also unclear as to whether they really
 are compensatory as they are included in the development land, hence they could be
 accessed by residents in the new houses, also if not resident parking other visitors to the
 village could utilise the car parks which could prevent residents who are displaced from
 parking outside their house using it
- Concerns over flooding, particularly the A56. I regularly use the A56 and am very aware of how unstable the banking is and how the bypass floods already, I am concerned that the development particularly on the Taylor Wimpey and Anwyl land will exacerbate this and further increase risk to road users
- Concerns over infrastructure and amenities being insufficient, which was also detailed in the Places Matter Design Review e.g. there are no plans for additional primary school and secondary school provision, in fact Taylor Wimpey openly state that they see no need for increase school support for their 238 proposed houses. GP's, dentists, shops etc. to accommodate the increase in size of and number of residents living in the village are also ignored.
- Concerns over lack of Greenspace the proposed Taylor Wimpey development is cramped with houses with no green spaces as is recommended in the Places Matter Design Review. It concerns me that this will be the same for all developers.

Overall I have read the letter by Rossendale Council in response to the first proposed Masterplan and Taylor Wimpey planning application and the objections by statutory consultees and do not believe that either of the revised plans meet the requirements detailed in their response.

Objection to the Masterplan and Taylor Wimpey's planning application

Application no: 2022/0451

This is my objection to the above and the reasons why.

General

- The masterplan is for Taylor Wimpey and not the whole site that is being proposed and the other planners. This should be led by RBC or the four developers as required by the RBC local plan.
- This is a charming village with a sense of community. This will be lost with the amount of proposed houses.
- There is not the infrastructure to support all these houses.
- The cost to the environment, pollution, flooding to the A56, loss of green space.

The Village as a whole

- The double yellow line system, affecting residents, discriminating against the elderly, those with children and the disabled making every day living difficult if not impossible.
- Discriminating against local business as the double yellow lines will affect them no parking – no customers – no business – loss of livelihoods – loss of community.

Edenfield South – Will affect my household directly.

- One way system on Exchange St ludicrous and will not resolve safety concerns. Blind turning left onto Exchange St which is a major issue for vehicles, pedestrians and cyclists.
- Highfield Rd/The Drive/Eden Avenue not built to take the volume of traffic that will travel down an already congested road with double parking, children playing. Visibility is poor and so safety of cyclists both adult and children and pedestrians. The roads are not wide enough for the cars they already serve.
- The Pump track is opposite the junction of Highfield Rd and Exchange St, a serious safety concern for the children playing/cycling on it, to and from it.
- Double yellow lines, Market St and Exchange St will reduce footfall to the local businesses and potentially reducing/stopping any new businesses starting up. Again, discrimination for the residents (who will not be able to shop locally) and the businesses that are and have been established in this village for many years.
- Again, the double yellow line system affecting residents, discriminating against the elderly, those with children and the disabled making every day living difficult if not impossible.
- The location of the proposed 'gateway' is in a dangerous position and misrepresents the start/exit of the village. It is unlikely to have an effect on road and pedestrian safety because of the size of the development and increase of traffic. The closure of the A56 has already highlighted this and when there is an accident of the A56/M66 Edenfield cannot cope with the traffic that travels through it.
- Who will the proposed additional parking on the Anwyl site service? Is it for residents? Not ideal and again discriminatory for those with disabilities, the elderly and for the safety of
those with children, especially when negotiating shopping and children etc. Is it for new residents on the new site? Will it be enforced? Electric charging points? It is most likely going to be insufficient for the amount of residents who will need it.

Edenfield – Central – will affect me as I use both the road (driving) and as a pedestrian.

- Compensatory parking for residents will not be large enough nor fit for purpose. Electrical charging points? Trades people? No disabled provision. Again, discriminatory against residents and especially those with disabilities, the elderly and those with young children.
- No phasing proposal for the TW site and therefore congestion will be severe and detrimental to traffic, pedestrian and cyclists safety.
- Flood safety risk, run off water (greenbelt removed therefore nowhere to absorb water from rainfall) onto the A56 which has already had known failure of infrastructure/embankment and could reduce stability further and put road uses at risk (M66 had a recent fatality because of a waterplane after heavy rainfall, which with global warming as from what we have already seen is on the increase). 82 Market St not a single dwelling and the old Horse and Jockey site now Pilgrim Gardens with several houses and a junction that leads onto Market St.
- No space to relocate the bus stop.
- Only one crossing point, not wide enough to incorporate cyclists and serious safety concerns for pedestrians. In particular young vulnerable primary aged school children crossing Market St from the south side.
- Pavements not wide enough and to ensure safety of pedestrians, they should be 2m wide yet roads not wide enough to incorporate this width.
- No greenspaces in the proposed housing development as recommended in the Places Matter Design Review Report. Cramped layout and poor design (no character whatsoever) thus cost saving!
- Maps incorrect affecting the accuracy of traffic proposal and leading to further road and pedestrian safety concerns.

Edenfield - North – will also affect myself as I use both these roads as a motorist and as a pedestrian.

- Proposed release of MORE GREENBELT on the opposite site to the proposed building. This is
 not included in the Rossendale adopted local plan and would set a precedent for the council
 to release more greenbelt land. WE WILL HAVE LOST FAR TOO MUCH WITHOUT THIS
 ADDITION!!!!
- Proposal of 2 more junctions resulting in EIGHT junctions concentrated in one very small area, all entering and exiting a 30mph zone, all with limited visibility and so MORE serious safety concerns for pedestrians, young children going to and from school, cyclists and all traffic.
- Gateway proposed As already said in Edenfield South.
- MORE double yellow lines in front of houses discriminating against residents already living in Edenfield, the elderly, disabled and those with young children.
- Uncontrolled crossing area at school which is not wide enough for pedestrian safety. How will children be supervised crossing the road VERY SERIOUS SAFETY CONCERNS!!!!
- Parking for those dropping off children at the school. Already restricted, already narrow road, already no crossing patrol. Congestion at drop of and pick up untenable and will be VERY VERY dangerous to ALL pedestrians and traffic alike!

- No crossings on Blackburn Rd or Burnley Rd serious safety for the residents on these roads along with other pedestrians using these roads. Safety for children walking to school, the elderly and those with disabilities.
- Cycle path from centre of the village (as in masterplan) which does not appear to link to the cycle path north of the village: Church Lane; hence NOT FIT FOR PURPOSE!!!!

AND OF MASSIVE CONCERN

- No comprehensive masterplan including all input of ALL developers.
- Proposed further release of greenbelt.
- Greenbelt compensation proposals are unclear and need clarification.
- Proposed new junctions unsafe and not fit for purpose.
- Serious traffic, cycle and pedestrian safety concerns could result in serious injury or worse still a fatality.
- No road safety audit, despite this being raised as a concern on several occasions and it is believed the traffic proposal would not pass a road safety audit.
- Double yellow lines and restrictions on parking will have a negative effect on local businesses resulting in a negative effect on the local economy, not to mention the livelihoods of those businesses and opposite of what was promised in the local plan.
- No phasing proposal, concerns over road safety, pedestrians and cyclists, if phasing is ignored and building undertaken simultaneously.
- Discrimination of existing residents to accommodate the needs of residents in new houses.
- Risk of flooding overall but in particular the A56 leading to serious traffic and public safety concerns (which is apparently awaiting national highways feedback).

Colin Campbell

Subject: Edenfield master plan Objection To: <<u>forwardplanning@rossendalebc.gov.uk</u>>

Dear sir / madam,

I am emailing to put in writing my objection to the Edenfield master plan.

I oppose the plan for the following reasons:

1. The village roads cannot cope with an increase in traffic. There is not enough parking as it Is and the small village road (market street) is regularly congested. Another 400 homes will make this worse.

2. The village does not need more housing. There are plenty of houses here already. The new development off Rochdale Road is undersubscribed. The developers there have not sold the houses they have built. There are plenty of houses on the market without buyers.

3. The community already struggle with school / doctor /, dentist facilities. Where are the additional services being provides for a possible another 400 families.

4. The disruption it will cause to current residents on Market Street will be horrendous for them.

5. The most important reason I object to the plan is you are propsing to build on land that is GREENBELT land. We need our green spaces. We cannot lose any more

I really hope you take the time to actually consider what the residents want and need in THEIR own community.

Thank you for reading. Mrs Elaine Woodhead

Edenfield Community Neighbourhood Forum

Representations about Masterplan / Design Code (June 2023) Proposed by Randall Thorp for H66 Land West of Market Street, Edenfield

1. Interpretation, Summary Reasons for Rejection and Background

1.1 Interpretation, abbreviations and definitions

in these representations, extracts of Policies and Strategic Policies and their Explanation in the Local Plan are coloured blue, and expressions and abbreviations have the following meanings -

Section or paragraph number followed by 'above' or 'below' - a Section or paragraph of these representations, unless otherwise apparent from context

application - planning application reference 2022/0451 submitted to RBC on behalf of TW for the construction of 238 dwellings in the central portion of H66

DAS - Design and Access Statement submitted with the planning application

dph - dwellings per hectare

ECNF - Edenfield Community Neighbourhood Forum

Executive Summary - Executive Summary in the MDC beginning on unnumbered page 08

H66 - the site allocated for housing by the Local Plan under reference H66 Land West of Market Street, Edenfield

ha - hectares

LAP - local area of play

LCC - Lancashire County Council

LLFA - Lead Local Flood Authority

Local Plan - the Rossendale Local Plan adopted by RBC on 15 December 2021

MDC - the Masterplan and Design Code dated June 2023 (Version V13) and presented by Randall Thorp that is the subject of consultation and these representations

NPPF - National Planning Policy Framework (July 2021)

page, with a number - unless otherwise stated, a page of the MDC

Planning Statement - Planning Statement (Including Heads of Terms, Waste Management Strategy and Affordable Housing & Parking Provision Statements) submitted with the planning application

Policy, or Strategic Policy - a Policy, or Strategic Policy, of the Local Plan

PPG - Planning Practice Guidance, promulgated by the Government

PROW - Public right(s) of way

RBC - Rossendale Borough Council

SCI - Statement of Community Involvement, dated July 2022 and submitted with the planning application

SHLAA - Strategic Housing Land Availability Assessment

SSP - the site-specific policy in the Local Plan for H66

SUDS - Sustainable Drainage System(s)

TW - Taylor Wimpey

unnumbered page - page of the MDC, the number of which is not shown and has to be reckoned by reference to one or more adjacent pages

1.2 Summary Reasons to Reject the MDC

a) The MDC does not apply to the whole of site H66, as the SSP contemplates, as at least two site owners were not involved in its preparation, and does not state on whose behalf it was prepared. (paragraphs 1.3.7 and 3.1.2 to 3.1.6 below).

b) Contrary to its bogus claim, the MDC is not accompanied by an agreed programme of implementation and phasing, although this is a requirement of the SSP. (paragraphs 3.2.1 to 3.2.7 below). Nor is there an infrastructure delivery schedule.

c) There is no agreed design code in accordance with which development can be implemented, contrary to the SSP and Strategic Policy ENV1 (Section 5 below);

d) MDC accords insufficient weight to the Design Code in emerging Neighbourhood Plan, which should be the basis for the design and layout of H66 (Section 5 below);

e) The comprehensive development of the entire site has not been demonstrated and in particular (paragraph 2.8 below) there is

- no planned highway network for the whole site,
- no clarity about drainage arrangements for the whole site,
- no overall provision for landscaping and open space, and
- no assessment of required developer contributions;

f) RBC must insist on a comprehensive masterplan and design code for the whole site, as the opportunity for a masterplan was a reason for removing H66 from the Green Belt (paragraph 2.1 below);

g) MDC mistakes the availability outside H66 of FP126 and FP127 for cycling (paragraphs 12.2 and 12.3 below)

h) MDC does not accord with national planning policy or with planning practice guidance (Section 6 below);

i) MDC content is inadequate or incorrect, in its Vision, lack of protection for woodland, lack of site-wide ecological assessment, dismissing value of views from the east, not requiring the removal of a large mound of spoil, not identifying public and private rights of way, showing the Green Belt boundary in the wrong place and exaggerating the effect of landscaping in preventing encroachment, proposing estate roads of less than adoption standard and describing the street hierarchy (Sections 7 and 8 below) and not protecting views to and from the Parish Church (paragraphs 14.5, 14.7 and 14.10 below);

j) MDC does not protect the drystone walls along the Market Street boundary and the boundary with 5-8 Alderwood Grove (paragraphs 9.2.1 and 9.2.2);

k) MDC disregards the SSP by failing to demand landscaping throughout the site, including the interface with existing dwellings (paragraph 9.3 below);

I) MDC fails to acknowledge that it has yet to be demonstrated that SUDS can be safely accommodated (paragraph 9.1 below and Section 13 below);

m) Proposed off-site car park and LAP encroach into Green Belt and should have been raised at Examination of Local Plan, presume that they would receive planning permission, present danger to traffic and pedestrians, are in a location that does not meet accepted LAP criteria and involve loss of street parking. There is no information about their drainage, lighting and maintenance. Development of H66 must be contained within site (Section 10 below);

n) MDC misunderstands requirement of compensatory improvements within the Green Belt (paragraphs 12.1.1 and 12.2.2 below);

- o) MDC's proposed housing density is too high (Section 15 below)
- p) Reconstituted stone is unacceptable throughout, and brick is inappropriate. (Section 14 below);
- q) Simplistic approach to enabling appreciation of heritage assets (paragraphs 7.3 and 14.8 below);
- r) Codes ignore heritage assets and fail to safeguard their setting (paragraph 14.9 below);
- (s) various deficiencies in Design Code and Area Types (Sections 13 and 14 below);
- (t) the developer's transport assessment is inadequate (Section 11 below)
- (u) An equality impact assessment of the application should be conducted (Section 16 below)

1.3 Background

1.3.1 A local consultation of sorts was conducted on behalf of TW in June/July 2022. This is being misrepresented by the authors of the MDC as being for a masterplan for the whole of H66, when in reality it was only for the land of TW and Anwyl. ECNF pointed this out in January 2023 in response to the consultation on previous versions (V7 and V8) of the MDC, and it is deeply regrettable that the MDC (page 21) perpetuates the error (please refer to Section 4 below).

1.3.2 TW, apparently with the support of Anwyl, submitted to RBC in Autumn 2022 Version V7 of a Masterplan and Design Code for H66, which was taken out of the Green Belt and allocated for housing in the Local Plan. In the central portion of H66, TW own a large part and other potential developers are the respective owners of Alderwood and the former Vicarage. Anwyl represent the owners of the southern portion. The northern portion is in two separate ownerships: Peel L&P and Mr Richard Nuttall, neither of whom was involved in preparing Version V7.

1.3.3 TW's portion of H66 is the subject of the application. The documents supporting that application included Version V7 of the Masterplan and Design Code, dated 3 October 2022. RBC committed, rightly, to putting Versions V7 and V8 of the Masterplan and Design Code to consultation, and launched a concurrent statutory consultation about the planning application, which, because of time constraints, RBC did not wish to delay.

1.3.4 Notably, Version V7 stated by whom, but not on whose behalf, it was prepared. Version V7 included the logo of Peel L & P on the first two pages, as well as those of TW and Anwyl, thereby dishonestly giving the impression that it was endorsed by Peel.

1.3.5 On the RBC website pages relating to the consultation about the Masterplan and Design Code, but not on the RBC website pages relating to the planning application, Version V7 was replaced by Version V8 dated 30 November 2022 which omitted the Peel L & P logo. Version V8 still did not state unequivocally on whose behalf it was produced. RBC's website page introducing the Masterplan and Design Code advised that the document was amended to

- *Remove Peel Land and Property's logo from the cover/introduction;*
- Make it clear that Peel Land and Property did not input into the document; and
- Correct a small number of typing errors.

1.3.6 In Version V8 a paragraph was added on the unnumbered page 8 in bold print:

Peel have not had input to this document as they were not in a position to engage when it was produced. This is confirmed in the Masterplan at Fig. 2.1.

1.3.7 The MDC was received by RBC in June 2023 and is now the subject of consultation. It does not state on whose behalf it has been prepared. Around the same time a raft of revised documents was submitted in support of the planning application, which RBC have also put out to consultation. There are two basic objections to this approach by TW. One is that the Masterplan and Design Code need to be settled first. Then, informed by those agreed documents, applications for planning permission can be made. It is difficult to escape the conclusion that the MDC has been drafted to fit the planning application. Secondly, a repeat consultation in duplicate, which TW have forced on RBC, is calculated to cause confusion, particularly among the general public, not all of whom will be familiar with the intricacies of planning procedure.

1.3.8 The MDC itself is badly presented. More than half its pages, and most of those with text, do not carry a number, causing gratuitous inconvenience to readers and those who wish to comment on the content by reference to pages.

Section 2 Masterplan for whole of H66 is a policy requirement

2.1 H66 was removed from the Green Belt and allocated for housing despite considerable opposition. Part of RBC's justification was that allocating it for housing presented the opportunity to masterplan a large site. A key topic in Strategic Policy SS; Spatial Strategy (paragraph 30) is:

• **Strategic Green Belt releases** for housing are proposed in Edenfield. The development in Edenfield creates the opportunity to masterplan a substantial new addition to the village that would have a limited impact on the openness of the Green Belt.

In the Explanation of Strategic Policy SD2, paragraphs 50 and 51 of the Local Plan state:

• 50 At Edenfield the justification for Green Belt release particularly relates to the strong defensible boundary of the A56 and the opportunity to masterplan the site to produce a high quality planned housing development that minimises impact on openness. There is strong market demand in the area....

• 51 Masterplanning or, for smaller sites, the development of a design framework, will be expected to demonstrate how the design of the scheme minimises impacts on openness such as through the location of development within the site; the scale of the buildings and appropriate landscaping

2.2 Accordingly, the Local Plan included a SSP, of which the parts directly relevant to this consultation stipulated:

Development [of H66] for approximately 400 houses would be supported provided that:

- 1. The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing;
- 2. The development is implemented in accordance with an agreed design code . . .

2.3 The SSP includes an Explanation for those provisos, at paragraphs 120, 121 and 126, as follows:

120 Exceptional circumstances have been demonstrated to support the release of this land lying between the A56 and Market Street in Edenfield from the Green Belt. The area is very open in character and allows views of the surrounding hills and moors and will require a well-designed scheme that responds to the site's context, makes the most of the environmental, heritage and leisure assets, and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements.

121 Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a Masterplan is prepared.

126 In light of the site's natural features and relationship to surrounding uses, development is likely to come forward in a number of distinct phases. The infrastructure associated with the overall development and each individual phase will be subject to the production of a phasing and infrastructure delivery schedule to be contained in the Masterplan. Site access will be a key consideration.

2.4 Having set much store by the opportunity to masterplan a large site and used that as a reason for removing the site from the Green Belt, RBC will wish to uphold the SSP and the commitment in paragraph 121 to ensuring the preparation of a masterplan covering H66 in its entirety.

2.5 It has been suggested that the respective landowners are not minded to co-operate on producing a masterplan and that the RBC cannot force them to do so. That may be the case, but it does not dispense with the need for a masterplan.

2.6 If any of the respective landowners anticipated difficulty in preparing a site-wide masterplan, they should have flagged this up at the Examination of the Local Plan. None of them did so, the Inspectors approved the policy, and the Plan was duly adopted.

2.7 The landowners' disinclination to produce a comprehensive masterplan need not frustrate development of H66. RBC itself can organise the production of a masterplan. As the site was promoted by RBC for housing development, it would not be inappropriate for RBC rather than the developers to take the lead on this, particularly in view of RBC's stated commitment at paragraph 121 of the Local Plan (see paragraph 2.3 above), to ensure that a masterplan is prepared.

2.8 A comprehensive masterplan for the whole of H66 is a Policy pre-requisite for development, and the lack of one would have at least four consequences:

- 1. There is no planned highway network for the whole site. Piecemeal development risks creating ransom strips that could hold up development on the rest of H66.
- 2. It is not clear that there is an overall drainage system for the whole allocation.
- 3. There is no overall landscaping plan including open space provision.
- 4. There is no indication as to how the necessary developer contributions might be determined, apportioned and agreed.

Section 3 MDC does not meet the requirements of a Masterplan for H66

3.1 Comprehensive development of the entire site

3.1.1 The masterplan must demonstrate the **comprehensive** development of the **entire** site - criterion 1 of the SSP.

3.1.2 It might reasonably be expected that any proposed MDC submitted in support of development would be prepared after all potential developers had been given the opportunity to participate and that the document would state that this had been done and indicate exactly which potential developers do or do not support it.

3.1.3 This is especially important, given that TW were exposed for having used another owner's logo without permission on a previous proposed masterplan for H66. However, the MDC contains no such statement. Indeed, the MDC does not specify on exactly whose behalf it is put forward. The arch statement in small print on unnumbered page 6 referring to the northern extremity of H66 -

landowner not in a position to engage at the current time

- glosses over the fact that Mr Nuttall for one is not on board.

3.1.4 The MDC assumes that there are only four interested developers. This is not correct. A cursory inspection of the planning history shows that the owners of Alderwood (off Market Street) have been interested since at least 1996 in further residential development there. Currently, planning application 2022/0577 for nine dwellings awaits determination. As that site is within H66, it should have been included in the MDC.

3.1.5 Similarly, the owners of the former Vicarage on Church Lane should at least have been given the opportunity to join in the MDC process.

3.1.6 It is obvious that without the concurrence of all the relevant landowners the MDC does not and cannot demonstrate an achievable "comprehensive development of the entire site".

3.2 Phasing

3.2.1 With the MDC must be an agreed programme of implementation and phasing. An infrastructure delivery schedule is also required. See criterion 1 of the SSP and paragraph 126 of the Local Plan (reproduced at paragraphs 2.2 and 2.3 above).

3.2.2 Unnumbered page 54 considers phasing. It identifies four phases of development but then in complete disregard of the SSP declares:

the ordering of development phases may be varied or delivered simultaneously.

3.2.3 The MDC is silent about an infrastructure delivery schedule.

3.2.4 The Executive Summary claims to address fully criteria 1 and 2 of the SSP and underlines 'with an agreed programme of phasing and implementation'. It claims to present "a phasing and implementation strategy". Unless a free-for-all counts as a strategy, those claims are false.

3.2.5 The 'Policy compliance table' on unnumbered page 8 claims misleadingly that implementation and phasing are fully addressed.

3.2.6 The unnumbered page 70 says about Phasing:

Development of the H66 allocation should be undertaken in a phased manner broadly as indicated in the adjacent table, however the independent nature of each developer's land holding ensures that each parcel can be delivered independently without prejudice to the others. On this basis the ordering of development phases may be varied or phases may be delivered simultaneously.

3.2.7 The MDC therefore runs completely counter to the SSP requirement for the Masterplan to be accompanied by an agreed programme of implementation and phasing. Not the least concern is the need to avoid the pressure on site accesses and build-up of traffic and workers' parked vehicles associated with four or five adjacent construction sites.on H66

3.3 No agreed Design Code

3.3.1 The SSP states:

The development [of H66 for 400 houses] would be supported provided that . . . 2. the development is implemented in accordance with an agreed design code.

One of the Local Plan Objectives (page 12) is:

ensuring good design that reinforces Rossendale's local character.

Strategic Policy SS: Spatial Strategy includes:

Greenfield development will be required within and on the fringes of the urban boundary to meet housing and employment needs. The Council will require that the design of such development relates well in design and layout to existing buildings, green infrastructure and services.

Paragraph 234 of the Explanation of Strategic Policy ENV1 states:

Design briefs or design codes will be required for major development and other sites as appropriate to help deliver high quality proposals. The Council will work with developers to address the nature and scope of these documents. The Council will prepare a Design Guide SPD to provide specific advice to developers. An SPD addressing climate change will also be produced.

3.3.2 It is not stated in the MDC that any of the landowners has agreed to any part of it. We know that Mr Nuttall has not engaged with it (please refer to paragraph 3.1.3 above). The owners of Alderwood have not been involved. In those circumstances it would be wrong for RBC to impose the MDC's concepts on any of the owners. RBC's only proper course is to reject the MDC. No Masterplan and Design Code should be entertained by RBC unless it is stated to have, and does have, the support of all the landowners.

3.3.3 The Executive Summary (unnumbered page 8) claims that the agreed design code in accordance with which development is to be implemented is fully addressed within the MDC. In fact the Design Code, and indeed the whole MDC, has not been agreed. The Executive Summary refers to Sections 04 and 05 of the MDC, which are appraised at Sections 13 to 15 below.

3.4 Summary

3.4.1 The MDC does not meet the requirements of a site-wide Masterplan and should be rejected. It is not agreed by all landowners and does not cover the whole of H66. Nor is there an agreed programme of phasing and implementation and an infrastructure delivery schedule.. A masterplan and an agreed programme of implementation and phasing are specific policy requirements, as is an agreed Design Code. Without them there can be no guarantee as to how the totality of the housing allocation can function adequately or be of good design.

Section 4 Stakeholder engagement

4.1 Page 21 states under the heading 'Stakeholder Engagement':

This Masterplan and Design Code has been developed in consultation with the Local Planning Authority (LPA) and local stakeholders.

A public consultation exercise for the H66 Masterplan process was undertaken prior to the submission of a planning application for the Taylor Wimpey land. This public consultation exercise related to the whole H66 allocation, seeking to gain views on the overall Masterplan and agreeing high-level principles. The consultation provided the opportunity for local residents to provide feedback online and via post/phone. A webinar was also held for residents to ask questions of the Development Team. Local residents were informed about the consultation by a leaflet drop and a letter was also sent to local councillors.

4.2 TW's masterplan consultation leaflet, distributed in June 2022, declared that the subject land was the site promoted by Taylor Wimpey and Anwyl Land (*"our site"*), and the home page of the TW/Anwyl consultation website referred to the land *"that is in Taylor Wimpey and Anwyl's control"*. It is therefore simply untrue to claim, as the MDC does, that a site-wide masterplan had been the subject of public consultation before the planning application was submitted. ECNF drew attention to this in their response to RBC's consultation on Version V8 of the Masterplan and Design Code and in their observations about the SCI as part of their representations about the planning application. It is deplorable that, in an apparent desire to pursue their false narrative, the authors of the MDC have ignored the facts placed in front of them and doubled down on their original lie.

4.3 There is a lot more that is wrong with page 21 -

- It is not clear which, if any, local stakeholders were consulted, but no part was developed in consultation with ECNF, which is obviously local and which, as a group concerned with town and country planning and established under statute, is obviously a stakeholder. RBC regard ECNF as a stakeholder see paragraph 121 of the Local Plan, quoted at paragraph 2.3 above
- In turn that raises doubts about how much, if any, consultation actually took place with other stakeholders and RBC
- The TW consultation was about the TW and Anwyl sites only, not H66 as a whole see paragraph 4.2 above
- There was no opportunity to respond by post
- It is not claimed that any responses during the consultation period were fed into the MDC certainly ECNF's response was not (see for example Section 5 below).

4.4 Readers of the consultation leaflet and website pages (and the letter to RBC and LCC councillors and the press release) could not have used the postal address that has been said to have been available, as it was not published in those places. Unsurprisingly, zero letters were received (paragraph 3.3 of the SCI).

4.5 People who did not have access to or who were not comfortable with using a telephone or electronic device were thereby excluded.

4.6 The SCI claims that a dedicated email address was established to answer enquiries, although it does not claim that enquiries by email were ever actually answered. ECNF is aware of cases where an email enquiry received no response.

4.7 Page 21 refers to the Design Code's having been *"reviewed and updated to address many of the comments made"* by the Places Matter Design Review Panel in March 2023. No doubt that Panel will be invited to comment on the current MDC. Meanwhile it appears that many of the Panel's criticisms continue to apply, *e.g.*, generic design, "one lump and wall of development", lack of integral green spaces, key views, lack of nuance of topography, suburban attitude, inferior building materials.

Section 5 Local planning policy - no reason to give only limited weight to the Design Code in the emerging Neighbourhood Plan

5.1 The MDC refers at unnumbered page 18 to

the initial informal Regulation 14 consultation on a draft [of the Neighbourhood] Plan (and Design Code Report prepared by AECOM) undertaken by ECNF] in March and April 2023.

5.2 In fact there was nothing informal about that consultation, which was carried out in strict accordance with the Neighbourhood Planning (General) Regulations 2012, as amended, and with the benefit of advice from RBC. ECNF condemn the misrepresentation and request deletion of the word "informal".

5.3 The MDC continues:

It is pertinent that the plan and Design Code largely ignore the allocation of H66 and Edenfield's elevated status as a 'Urban Local Service Centre' in the adopted Local Plan, and focuses on the existing vernacular and characteristics of the village.

5.4 The Neighbourhood Plan and Design Code were prepared in the knowledge that the (then emerging) Local Plan allocated H66 for housing. Prior to the Regulation 14 consultation it was amended after consultation with RBC. In the light of responses to the Regulation 14 consultation, the text of the Plan will be further amended to take account of the adoption of the Local Plan. As regards the issue of whether Edenfield should be treated as urban or as a village, we note the comment at the top of page 8 of Places Matter's assessment dated 25th March 2023 of Versions V7 and V8. :

You are forgetting about the things that make this sort of village attractive and showing a suburban attitude to what the new place will look like.

5.5 In any case the word 'Urban' in the expression 'Urban Local Service Centre' is not to be taken as a *carte blanche* for development. Whilst Edenfield is identified as an Urban Local Service Centre by Strategic Policy SS: Spatial Strategy, paragraph 30 of the Local Plan makes clear that "The development in Edenfield creates the opportunity to masterplan a substantial new addition to the village that would have a limited impact on the openness of the Green Belt". H66 "will require a well-designed scheme that responds to the site's context" (paragraph 120, ibid.) and "development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance" (paragraph 125). See also paragraphs 50 and 51 of the Local Plan (noted at paragraph 2.1 above).

5.6 The MDC declares at unnumbered page 18:

Given this conflict with the Local Plan, the early stage of the document, and the fact it postdates the submission of this Masterplan & Design Code it has only been given limited weight.

5.7 In similar vein the MDC states at page 21:

This Masterplan and Design Code also takes account of the AECOM Design Code Report within the emerging Neighbourhood Plan, albeit this has only been given limited weight, due to its early stage of production (with the initial Regulation 14 consultation undertaken in March and April 2023, some time after this document was submitted) and the fact that it largely ignores the development of the H66 site and is primarily focused on the existing vernacular and characteristics of the village.

5.8 ECNF denies that the emerging Neighbourhood Plan is in conflict with the Local Plan and considers it to have progressed to its middle to late stage. The MDC's use of the word 'postdates' is puzzling: being dated 9th June 2023 (see unnumbered page 2), it is obviously the MDC that postdates the Regulation 14 consultation version of the Neighbourhood Plan. It is simply wrong to say that the Regulation 14 consultation took place after submission . The reasons for giving limited weight to the Neighbourhood Plan and Design Code are therefore completely spurious.

Section 6 MDC is contrary to National Planning Policy and to Planning Practice Guidance

6.1 Unnumbered page 14 of the MDC refers to the NPPF:

The NPPF was updated in July 2021. The revised NPPF promotes a presumption in favour of sustainable development for both plan making and decision-taking (Paragraph 11).

Section 12 of the NPPF, "achieving well- designed places", states (paragraph 126) that 'good design is a key aspect of sustainable development, creates better places to live and work and helps make development acceptable to communities'

Paragraph 130 states, 'planning policies and decisions should ensure that developments:

- Will function well and **add to the overall quality of the area**, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); and
- Establish or maintain a strong sense of place, using the arrangements of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit'.

Paragraph 131 requires 'planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as park and

community orchards), that appropriate measures are in place to secure the long term maintenance of newly-planted trees, and that existing trees are retained wherever possible'.

Paragraph 134 emphasises that 'development that is not well designed should be refused'.

Section 14 of the NPPF, Meeting the Challenge of Climate Change, Flooding and Coastal Change (paragraph 154), sets out that in order to plan for climate change, new development should be planned for in ways that:

- a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards'.

Section 15 of the NPPF, Conserving and Enhancing the Natural Environment, (paragraph 174) sets out how planning policies and decisions should contribute to and enhance the natural and local environment by:

- **'Protecting and enhancing valued landscapes**, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economic and other benefits of best and most versatile agricultural land, and of trees and woodland'.

The Masterplan proposals presented within this document consistently follow the principles set out in the NPPF.

6.2 The emboldened extracts in paragraph 6.1 above indicate areas in which the MDC fails to follow NPPF principles.

6.3 It is significant that the MDC does not quote paragraph 129 of the NPPF, which provides:

All [Design] guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area.

The absence of meaningful stakeholder engagement (Section 4 above) and the dismissal of the Design Code (action 5 above) in the Neighbourhood Plan, which fully reflects local aspirations, clearly demonstrate that the MDC does not conform with national planning policy.

6.4 Unnumbered page 14 and page 15 go on to consider PPG, which is referred to as NPPG and wrongly called "Planning Policy Guidance". Emboldened in the extract below are the areas where the MDC does not measure up to PPG:

The design section of the NPPG establishes the **importance of high quality design** as part of wider sustainable development and considerations alongside NPPF policies

The guidance states that proposals should be **responsive to the local context**. It is established that highly sustainable, well- designed developments should not be refused where there are concerns about compatibility with existing townscape, unless proposals cause significant impact or material harm to heritage assets. **Great weight is given to outstanding design quality which raises the local design standard.**

The guidance establishes that **good design can help schemes achieve social, environmental and economic gains** and that the following issues should be considered:

- Local character (including landscape setting);
- Safe, connected and efficient streets;
- A network of green spaces (including parks) and public places;
- Development context;
- Crime prevention;
- Security measures;
- Access and inclusion;
- Efficient use of natural resources; and
- Cohesive and vibrant neighbourhoods.

Acknowledgment is given to the value which is attributed to well designed places. The criteria establishing what a 'well designed place' should seek to achieve are: be functional; support mixed uses and tenures; include successful public spaces; be adaptable and resilient; **have a distinctive** character; be attractive; and encourage ease of movement.

Guidance is given on how buildings and the spaces between buildings should be considered. In terms of layout, developments should promote connections with the existing routes and buildings, whilst providing a clear distinction of public and private space. Care should be taken to design the **right form for the right place**, but the extent to which this is achieved can depend on architectural and design quality.

It is considered that the proposed development of this site accords with the NPPG.

Crammed layout, disregard of landscape and local context, lack of architectural and design quality actually make the MDC contrary to PPG.

Section 7 Content of MDC

7.1 Woodland Criterion 5 i of the SSP requires "Retention and strengthening of woodland to the north and south of the Church". The Executive Summary claims:

The Masterplan shows how existing woodland has been retained and strengthened where necessary/ practicable, notably to the south of the Church. To be refined through subsequent planning applications.

This is misleading. The MDC is silent about the woodland north of the Church, just one indication that the MDC has been cobbled together to support the planning application rather than being a comprehensive masterplan governing future applications.

7.2 Ecology Criterion 6 of the SSP requires that "an Ecological Assessment is undertaken with mitigation for any adverse impacts on the Woodland Network and stepping stone habitat located within the site" The Executive Summary states:

The Masterplan accounts for known ecological constraints across the allocation site. The TW Phase 1 application includes a detailed Ecological Assessment, as will subsequent applications to allow detail to be refined/ agreed.

That does not disguise the fact that there is no site-wide ecological assessment, which is what criterion 6 demands.

7.3 Vision The Vision on unnumbered page 10 includes:

• Retain and enhance the existing public footpath network to enable the appreciation of locally valued buildings located throughout the allocation site and in the local context.

The fact is that there are only two substantial buildings (the former Vicarage and the private house Alderwood) located in H66, whilst three heritage buildings are adjacent. As shown at paragraph 14.8 below, it is not necessary to enhance the footpath network to "enable appreciation" of the Church or desirable to do so in the case of private property.

7.4 Views The unnumbered page 26 is plainly wrong in stating:

There are limited views to the allocation site from rising land to the east of Edenfield due to topography and existing development within the village.

In fact H66 is clearly visible from much of the lengths of Footpaths 136, 137, 138, 140 and 143 and Restricted Byways 147 and 277, shown on the map at the Appendix hereto.

7.5 Artificial mound The MDC fails to address the need to clear the mound of spoil created during construction of the bypass from the area to the west and north west of Mushroom House. Restoration of the natural contours would mitigate the loss of views resulting from the development and reduce the dominance of the new housing.

7.6 Rights of Way Unnumbered page 38 refers to PROW FP 126 and FP127 and the (private) vehicular right of access to Chatterton Hey. For completeness it should have identified also the private rights of way to Mushroom House, Alderbottom and Swallows Barn.

7.7 Green Belt boundary It is nonsensical to claim (unnumbered page 42):

The masterplan allows space to create a defined Green Belt boundary which will follow the route of the A56 to the west of the site. Existing vegetation along this edge of the allocation will be retained and enhanced with a new woodland structure planting which will frame the western extent of Edenfield, preventing encroachment of development into the lower slopes of the valley.

During the Examination of the Local Plan it was stated that the A56 itself would provide a strong defensible boundary for the Green Belt. (See, for example, paragraph 50 of the Local Plan reproduced at paragraph 2.1 above.) The boundary needs no further definition. Encroachment of development into the lower slopes of the valley is already prevented by the A56 and the remaining Green Belt.

7.8 The map on page 43 incorrectly implies by the position of the words GREEN BELT BOUNDARY that the A56 is not in the Green Belt. Another error in this map is the inclusion of the words "and play area" in the caption to the green patch on the south east boundary of H66. Near the Church the map speaks only of "retained tree cover", not" retained and strengthened" as required by criterion 5 i of the SSP.

7.9 Estate roads By implication, the headings to the Table on page 69 suggest that secondary and tertiary roads are to be considered for adoption, private drives being expressly stated to be non-adoptable. It is therefore pointless to specify carriageways of widths less than LCC's minimum standard.

Section 8 Street hierarchy

8.1 The plan on unnumbered page 32 seems to exaggerate the extent of shops, the school and community facilities along Market Street, Bury Road and Bolton Road North.

8.2 The reference in the text on that page to "the M66/A56 roundabout" is confusing as the roundabout has no connection with the M66.

Section 9 Site constraints and opportunities and blue and green infrastructure

9.1 Unnumbered page 38 states:

The lowest lying land within the allocation is generally located along the western site boundary. This is the most suitable location to accommodate sustainable drainage ponds associated with development.

Unnumbered page 42 states:

Additional space is allowed along the south western edge of the site to provide surface water attenuation areas in the lowest lying parts of the site.

Those extracts do not tell the full story. The MDC needs to acknowledge (a) that it has yet to be demonstrated that a SUDS pond can be safely accommodated within H66 without detriment to the stability and safety of the A56 and (b) that any such pond will need the approval of LCC as LLFA.

9.2.1 Unnumbered page 42 continues:

The green infrastructure network is designed to ensure that valued existing landscape features can be retained. These are mainly limited to existing trees around Edenfield Parish Church and Chatterton Heys (sic), and dry stone walls located along the PROW routes through the allocation site.

The MDC needs also to commit expressly to retention and maintenance of the drystone wall along the site boundary with Market Street, except at the point of site access. Where Market Street is to be widened, the MDC needs to confirm that the drystone wall shall be re-erected.

9.2.2 The MDC needs too to commit to protecting the drystone wall at the site boundary with 5-8 Alderwood Grove and not allowing any development that might harm its integrity or obstruct its maintenance.

9.3 The Executive Summary says of SSP criterion 5 v ("landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development and provide a buffer to the new Green Belt boundary")

The Masterplan includes a substantial buffer along the western boundary to include landscape structure planting, with detail to be refined/agreed through individual planning applications.

In other words there is complete disregard of the full SSP requirement in 5 v of landscaping **throughout** the site and, in particular, to landscaping the eastern boundary at the interface with existing residential properties.

Section 10 Off-site car park and public open space

10.1 Unnumbered page 44 notes:

The Masterplan indicates an area for community car parking and public open space to the east of Blackburn Road, outside of the H66 allocation, with the detailed requirements and justification for this provision to be addressed through subsequent planning applications.

The accompanying plans (unnumbered pages 44 and 46) show the area, located east of Blackburn Road and Burnley Road. The access point is marked on the plan on page 46, which shows 33 car-sized parking bays plus 10 drop-off spaces, with the unquantified loss of street parking on Burnley Road

10.2 Whether this proposed car park is desirable, given that it is outside H66 and in the Green Belt, is doubtful. The possibility of this car park, on land owned by Peel, together with drop-off facilities and a play and recreation space and trails was first raised by Peel's subsidiary, Northstone, in a pre-application consultation this year.

10.3 It is alarming that, to justify developing former green belt, a car park and drop-off facilities and public open space are proposed in the remaining green belt. If this is essential to the development of H66 or Northstone's part of H66, it should have been raised during the Local Plan process. If the Inspectors had considered it appropriate, RBC could have made allowance for a further incursion into the green belt in the same way as the Policies Map provides for the potential extension of Edenfield CE Primary School. The matter was not raised, and therefore what remains of the green belt around Edenfield should not be subjected to development. All necessary car parking provision should be confined to H66.

10.4 The third proviso to the site-specific policy is -

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 [Rostron] Arms. Measures to assist pedestrian and vulnerable road users will be required.

10.5 The MDC lacks crucial detail about the car park and drop-off facilities and in particular the need for and feasibility of such proposals, as well as their implications for traffic flows and the availability of parking on Burnley Road. These matters need to be considered, in addition to all the matters in the third proviso, as part of a comprehensive transport assessment to be approved by LCC as highway authority and to be submitted with the MDC. It is to be noted that instead of proposing just one new access (from Blackburn Road to H66), the MDC proposes another (from Burnley Road to the car park/drop-off), and that both these accesses will be close to the signalled junction of these roads and Market Street.

10.6 It is not acceptable for the MDC to kick the can down the road and say "details to be confirmed through subsequent planning applications".

10.7 Northstone's argument in favour of the car park was plainly exaggerated. At FAQ 17 *Will this proposal increase traffic?* it was stated -

The proposals for the parking area will have a positive impact on traffic locally. It will reduce the issue of on street parking as well as remove traffic impact at peak times within the village at school drop off and pick up times and remove the necessity for a coach to reverse down Church Lane to turn.

It is improbable that the proposals would **remove** traffic impact at peak times. 'The necessity for a coach to reverse down Church Lane' is pure invention. It really strains credulity to say that a professional coach

driver in a ten- or twelve-metre long vehicle would attempt reversing into or out of Church Lane in close proximity to the signalled junction, rather than run round via the Edenfield by-pass.

10.8 There is a shortage or absence of information about the proposed car park and drop-off facilities and public open space, which Northstone described as a play and recreation space and trails. There is no clarity about the following:

- Will they be transferred out of Peel's ownership, and, if so, to whom?
- Notwithstanding the answer to Northstone's FAQ 14 Will local facilities be able to accommodate this many new homes in the area? -

Whilst we appreciate that our proposal will increase the population size in the local community, as part of the application Northstone will agree a financial contribution to Rossendale Borough Council or other relevant providers of services. This contribution will mitigate against any impacts that the proposed development may have on local services. The providers will be able to invest this into the local infrastructure where deficiencies have been identified

- at Northstone's consultation event, one of the ECNF members was given to understand that, if Peel provide the proposed car park and drop-off facilities, they would set off the cost against the section 106 contributions that would be expected of a development of this nature. That is not apparent from the MDC which fosters the impression that the proposed car park and drop-off facilities are a boon to be provided at no cost to the community. It appears that in reality RBC as representative of the local inhabitants will miss out on contributions which it could put to better use. Northstone's answer to FAQ 6 **Isn't this site located within the Green Belt?** is that '*the site of the proposed car park is within Green Belt but what we are proposing represents appropriate development and a valuable asset to the local community*'. The reality is that the community will be bearing both the financial cost and the loss of another field in the green belt.

- How would their introduction and continued availability for use be guaranteed?
- Who will manage them and be responsible for their maintenance, and how will such maintenance be funded?
- Will the car park be illuminated? If so, at whose expense?
- It would be dangerous for residents to use the proposed car park, as there is no footway on the east side of Burnley Road between the proposed car park entrance and the B6527 / Guide Court junction. They would have to walk in the carriageway or take a chance in crossing Burnley Road amid traffic speeding towards or away from the junction. How would these dangers be eliminated?
- On what evidential basis has it been determined that 33 is the appropriate number of parking spaces to be provided?
- The car park/drop-off proposal creates at least three potential traffic conflicts on Burnley Road: any queue at the traffic lights is likely to block the car park entrance/exit; in the event of such a queue right-turning vehicles emerging from the car park/drop-off would have limited views of approaching northbound traffic; and traffic from the south waiting to enter the car park/drop-off might tail back, affecting the efficient operation of the signalled junction. How would all those hazards be avoided?
- How, if at all, would sustainable drainage of the proposed car park and drop-off facilities be achieved? It emerged at the consultation event that Northstone are aware that drainage issues require attention.
- How many street parking places on Burnley Road would be lost?

10.9 Even if the above-mentioned questions were answered satisfactorily, there could be no guarantee that the requisite planning application for change of use from grazing to a car park involving the effective

extension of the Urban Boundary into the Green Belt would be approved. RBC cannot allow themselves to pre-empt the determination of a planning application for the car park by approving a MDC containing this proposal. Nor can RBC approve a MDC, a component of which might not receive planning permission.

10.10 At unnumbered page 22 it is stated:

Peel also control land to the east of Burnley Road, some of which can be made available for school expansion land, public open space and/or community car parking subject to planning requirements in accordance with the Rossendale Local Plan.

The problem with that extract is that it conflates school expansion land, for which the Local Plan provides, and a site for public open space and parking, which is not contemplated in the Local Plan. Particularly as this site is in the Green Belt, it is wrong to assume that this recent proposal, with its myriad unanswered questions, would receive planning permission

10.11 Accordingly, in Code US 02 on unnumbered page 58, the words "*off-site community car parking and/ or*" should be deleted.

10.12 Having described the proposed car park as "community car parking and public open space" (unnumbered page 44) and "off-street parking area" and "Northstone off-street car park area" (both on unnumbered page 46), "car park, public open space" (unnumbered page 50) and "community car park and public open space" (page 51), the MDC changes tack at unnumbered page 64 where it is called "Local Area for Play (LAP)", part of "a dispersed range of play experiences".

10.13 For a play area, the location is truly sub-optimal. Users would need to cross at least one busy road, enter and leave where there is no footway on the road and navigate through a drop-off area and car park. It fails to meet the parameters set out in the MDC (unnumbered page 66):

Local Areas for Play (LAPs) will provide informal open spaces with natural play opportunities, in accessible locations close to dwellings. They should be designed to appeal to all ages as a place for incidental play, social interaction amongst neighbours and a common space for people to enjoy in the close setting of their homes. LAPs should occur often and should offer variety in terms of their character, features and the play opportunities they provide. LAPs may be situated within housing areas or on the edge of housing parcels, bringing greenways into the development, enhancing the setting and play opportunities provided. . . . LAPs are more versatile as a result being accessible to the whole community for a variety of uses, such as a meeting place for friends or taking a quick break during a walk home from school.

Section 11 Transport assessment -

11.1 Please refer to letter dated 9th August 2023 from SK Transport Planning Ltd on behalf of ECNF.

11.2 Unnumbered page 46 wrongly includes under the heading "Off site highway improvements" the proposed on-site car parks off Market Street and Exchange Street.

11.3 The map on page 47 is out of date: it fails to show the junction of Market Street and Pilgrim Gardens and the new houses in the vicinity.

11.4 The maps on pages 46 (unnumbered) and 47 are unclear, lacking any key to the colours and symbols used, failing to show clearly (if at all) the extent of proposed restriction and prohibition of waiting, failing to show existing restriction and prohibition of waiting and showing yellow lines on Exchange Street without any explanation at all.

11.5 The higher resolution version of those maps that was subsequently published has a key, but only to new kerbs, existing and proposed road markings. There is still no explanation of symbols and no key to colours except green, for new kerbs, and grey and black for existing and proposed road markings, which

remain extremely difficult to discern and distinguish. On the higher resolution version the yellow lines on Exchange Street have disappeared. By 'yellow lines', in this and the last preceding paragraph, are meant lines on the map, not actual road markings.

11.6 A bizarre and unexplained feature of the map on unnumbered page 46 is a rain garden on Market Street, seemingly in the footway, near nos 155 and 157. Obviously this would represent an inconvenience to the numerous users of the footway. The proposal can be viewed only as a gesture of contempt to the public, negating any credibility that the MDC might have had.

11.7 Coloured chippings/aggregate seem pointless. It is not clear what 'gateway features' are being proposed, what purpose they would serve or how they might be safely accommodated in a narrow highway with a zebra crossing or at a busy junction.

11.8 The proposed restriction and prohibition of waiting will inconvenience residents who rely on the availability of street parking. It will be harmful to the businesses whose customers might go elsewhere if they cannot find a place to park.

11.9 The extensive proposed prohibition of and restriction on waiting outside existing houses will bear harshly on disabled occupiers and their carers who might otherwise have been able to apply for a disabled person's parking space outside their door.

11.10 One aspect of the on-site parking area intended to replace lost spaces on Market Street causes concern. It is proposed to be concealed by a mound, which, in addition to its aesthetic deficiencies and problems around its landscaping, would conceal criminals intent on damaging or breaking into vehicles or assaulting people going to or from the vehicles. It is wholly inimical to the concept of "Designing out Crime" or "Crime Prevention through Environmental Design'. RBC is required under section 17 of the Crime and Disorder Act 1998 to exercise its functions with due regard to their likely effect on crime and disorder, and to do all it reasonably can to prevent crime and disorder. The mound is contrary to NPPF, paragraph 130 f).

Section 12 Pedestrian and cycle connectivity

12.1.1 Unnumbered page 48 considers connectivity to the PROW network, access points to H66, retention of PROW within the site and of "characterful features" and a proposed new pedestrian and cycle route. The focus is on H66 itself, not the land beyond. The page continues:

Opportunities to improve signage of PROW routes should be explored and will be supported as part of subsequent individual planning applications. Signage improvements would be considered to be Green Belt enhancement measures.

If the MDC is suggesting that signage improvements within H66 (outside the Green Belt) count as a compensatory improvement within the Green Belt, they are misdirecting themselves.

12.1.2 Unfortunately, the Executive Summary gives the game away:

The Masterplan confirms that applications will improve accessibility to wider Green Belt through enhancing PROWs and signage on site. Off-site compensation can be secured through S106 contributions from individual applications.

It is unclear what is meant by "wider Green Belt". What is clear is that the authors of the MDC are in persistent denial of the requirements of national, local and site-specific policy, where green belt designation is removed, for compensatory improvements in the remaining green belt.

12.2 We question why the plan on page 51 shows "Proposed pedestrian/cycle access" at the junction of FP126 with Market Street and at its junction with FP127 when the plan shows that Footpath 126 at these points and Footpath 127 at its junction with FP126 are outside H66. There is no PROW for cycles on these footpaths, and that would continue to be the case unless the relevant authority reclassified them or the

owner re-dedicated them. The MDC does not assert that any of the owners of H66 owns the footpaths at these points and is thereby in a position to re-dedicate them.

12.3 The statement in the text on unnumbered page 68 -

Existing PROW routes through the site should be made suitable for cycling where viable to act as an informal expansion of the local cycling network.

- fails to acknowledge that, whilst within the site the owner might re-dedicate public footpaths for use by cyclists as well, outside the site there is no public right to cycle on FP 126 and FP127.

Section 13 Landscape Design Principles and SUDS

13.1 The second bullet on unnumbered page 60 needs to allow the removal of invasive, poisonous or dangerous plants and the removal of vegetation in accordance with good horticultural and arboricultural practice.

13.2 In the penultimate bullet on unnumbered page 60 insert after "pond/s" "in strict accordance with a design previously approved in writing by the Lead Local Flood Authority and by National Highways or other body responsible for maintaining the adjacent A56".

13.3 The text and Codes on unnumbered page 62 must be amended to show that any SUDS must be constructed in strict accordance with a design previously approved in writing by the Lead Local Flood Authority and by National Highways or other body responsible for maintaining the adjacent A56 and maintained in strict accordance with arrangements previously approved by those bodies.

13.4 Criterion 8 of the SSP requires "Geotechnical investigations to confirm land stability and protection of the A56, and suitability of locating SUDs close to the A56". The note in the Executive Summary that

The Masterplan accounts for ground conditions and land stability. The TW Phase 1 application includes a detailed Site Investigation worked up in dialogue with relevant consultees, as will subsequent applications to allow detail to be refined/agreed.

does not demonstrate compliance with the SSP. The suitability of the proposed SUDS has yet to be ascertained.

13.5 On page 63 Code NA 06 should be amended by the addition of "or, in the case of an application made before this Masterplan and Design Codes were approved, at the date of approval of the application". Otherwise, a developer could take advantage of submitting an application before the MDC is approved, despite the fact that the application should conform with the latter.

13.6 Unnumbered page 38 states:

The lowest lying land within the allocation is generally located along the western site boundary. This is the most suitable location to accommodate sustainable drainage ponds associated with development.

That might be so, but the text needs to be qualified by noting that it has yet to be demonstrated that H66 can safely accommodate one or more SUDS.

13.7 Likewise, unnumbered page 42 stating:

Additional space is allowed along the south western edge of the site to provide surface water attenuation areas in the lowest lying parts of the site

needs to be qualified by noting that it has yet to be demonstrated that H66 can safely accommodate SUDS.

13.8 If we accept the definition of 'spring' as 'place where water naturally flows out of the ground', it is hard to understand the statement on unnumbered page 38 that

Another small spring passes through the southern part of the allocation site, located to the rear of Eden Avenue and Oaklands Road.

Similarly difficult is the key's description "Spring" for the long green dotted lines on the map on page 39.

Section 14 Area Types

14.1 The proposed use of reconstituted stone (or fake stone, as the Places Matter assessment called it) as the building material in Edenfield Core (unnumbered page 82) is unacceptable. The reasoning is said to be:

Should complement the aesthetic of building materials found in the historic centre of the village due to visibility from Market Street, the immediate PROW network and wider views from the west of Edenfield.

We take this to mean that the building material is required to complement the aesthetic of the village centre, but fake stone will simply appear incongruous with the built environment, as the image (of FP126 bounded on one side by a drystone wall and on the other by a wall of reconstituted stone) at the top of page 83 shows.

14.2 The philosophy behind the Village Streets area type (unnumbered page 84) appears to be: 'It can't be seen, so design and appearance don't matter'. The fact is that it will be seen, from the A56, from the opposite side of the valley, from the churchyard, from properties along Market Street, from Exchange Street and the Recreation Ground and from higher ground to the east. It would also be seen from the Edenfield Core area.

14.3 The use of red brick on such an extensive development is even worse than fake stone and is out of keeping with the built environment. Furthermore it would immediately stigmatise Village Streets as the 'cheap streets', an inferior part of the development compared with Edenfield Core.

14.4 The claimed reasoning and influences for the red brick are

The area will be less visually prominent in the wider landscape resulting in increased potential to use varied building materials, drawing inspiration from post-1930's development in the southern part of Edenfield. This will add interest and variety to the wider development.

In this context "varied" seems to mean "cheaper". There is no reason to use development in the southern part of Edenfield, which is more distant from the Village Streets area than largely stone-built Market Street, as an inspiration - this just appears to be a poor excuse. Criterion 5 vi of the SSP requires materials and boundary treatments to reflect the local context

14.5 The "Key views to be considered" for Village Streets are identified as "Quality of views to and from recreation ground". This is simplistic and incomplete, but on Code AT/VS 08's limited terms the claimed reasoning and influences are:

Ensure development provides a characterful and attractive elevation to the interface with Edenfield Recreation ground.

A mass of redbrick elevations is unlikely to be characterful and attractive. There is no acknowledgement of the need to consider views across the valley to the west or to protect views to and from the Parish Church.

14.6 Notwithstanding the warning on unnumbered page 80 -

Where relevant, accompanying vignettes are not intended to be taken as literal representations of the different area types and are for the purpose of providing an illustrative view of each area.

- the image on page 85 captioned "Indicative character of the Village Streets" is extremely misleading in showing brick detached houses with front lawns and side parking, flanked by properties in fake stone, since

- the depicted scene is not consistent with a density of 35-40 dph;
- the only building material proposed by the MDC for Village Streets is red brick; and
- there is no indication of the red brick front boundary walls.

14.7 A glaring omission from the Codes for both Edenfield Core and Village Streets is any reference to designing the layout of the housing parcels to allow views to the Church to continue, although this is required by criterion 5 ii of the SSP.

14.8 Unnumbered page 36 identifies the listed building and non-designated heritage assets of direct relevance to H66. These are the Parish Church, the former Vicarage, Mushroom House and Chatterton Hey. Under the heading "Design Influences", the page states:

Heritage assets act as local landmarks that contribute to sense of place. Guide pedestrian movement routes to pass alongside heritage assets to allow visual appreciation

Ensure adjacent housing is complementary in architectural style and materials.

That is a simplistic approach. There needs to be a distinction between buildings that are public (the Church) and those in private occupation (the other three). The Churchyard, bounded on two sides by a public highway or right of way, is open to the public and anyone can walk round the exterior of the Church. The other three are all adjacent to rights of way, and there is no need for new routes, which would be likely to impinge on the privacy and security of the properties.

14.9 It might legitimately be expected that ensuring that new housing adjacent to heritage assets is complementary in architectural style and materials would be carried forward to the Site Wide or Area Codes. Unnumbered page 38 says that

Development must ensure that the setting of these buildings is conserved, and where possible enhanced.

but the Codes completely ignore heritage issues. They do not conform with paragraph 122 of the Local Plan, which requires development to consider the effect on the significance of heritage assets and to safeguard their setting.

14.10 The Executive Summary is dismissive of the need to comply with criterion 5 ii (Layout of the housing parcels to allow views to the Church to continue) of the SSP. All it says is:

The Masterplan will have minimal impact on existing views to the Church as they will be above the roofline of the new houses. Detail be refined through subsequent individual planning applications.

This criterion needs to be enshrined in the Site Wide and Area Codes. For all the reasons in this paragraph and paragraphs 14.8 and 14.9 above, the Executive Summary is wrong to claim:

Masterplan fully accounts for existing heritage assets (pages 36 - 39)

14.11 The key characteristic of the key views to be considered for Chatterton South is the "*Visual quality of development interface with PROW route*". The reasoning and influences are:

PROW passes along the perimeter of the area. Development should ensure high quality design at this interface to ensure the route remains pleasant and usable.

This is good, except for the implication that, away from the interface, design might not be of high quality. Paragraph 125 of the Local Plan is clear that development of H66, that is, all of H66, *"must be of a high quality design"*.

14.12 For Edenfield North, buff brick is one of the building materials proposed (unnumbered page 88). Natural stone would be the only acceptable building material at the approach to Edenfield. The proposed brick buildings might be out of view from Blackburn Road but would be an incongruous sight from the A56, from adjacent PROW and from across the valley.

14.13 The image of Burnley Road on page 89 with nos 101-105 in the foreground is captioned *"Proposed materials to complement existing local vernacular - white render"*. This is odd, because

- render (a coat of cement on an external wall of a property) is not a building material proposed for Edenfield North;
- nos 101-105 have a coat of white masonry paint, not cement; and
- the scene is at some distance from H66.

Section 15 Land use and density

151 In the Local Plan, Policy HS2: Housing Site Allocations proposed 400 homes for H66 on a net developable area of 13.74ha at a density of 29 dph. In contrast, unnumbered page 44 states:

The masterplan indicates a residential net developable area of 12.6 hectares. Delivery of 400 dwellings across the allocation site equates to an overall development density of 32 dwellings per hectare.

Having regard, inter alia, to paragraphs 120 and 125 quoted at paragraphs 2.3 and 5.5 above and 15.4 below of the Local Plan, it is strange that the MDC is proposing to increase the density from that proposed in the Local Plan. As the residential net developable area is now found to be less than that stated in the Local Plan (the net developable area of the TW site is only 7.1ha, down from 9.12ha in the SHLAA - Planning Statement, paragraph 3.9), the number of dwellings proposed needs to be correspondingly reduced and to take account of the ten which have already been built at Pilgrim Gardens / Market Street (Horse & Jockey site).

15.2.1 In stating "*a residential net developable area of 12.6 hectares*" for H66, unnumbered page 44 conflicts with unnumbered page 22, which claims:

Current ownership and control for the 'developable' areas of the H66 allocation is as follows: . . . *Taylor Wimpey are freehold owners of largest central part of the allocation (totalling 12.5 hectares).* . .

Anwyl Land control the southern parcel (measuring 4.75 hectares)....

Peel are freehold owners of the majority of the northern part of the site (measuring 2.2 hectares).

Richard Nuttall controls the remaining land (measuring 1.85 hectares).

Those numbers add up to 21.30ha and would appear to refer to the gross site areas rather than the developable areas. Unnumbered page 22 is also wrong to suggest that TW own all the central part of H66, which, as the Policies Map shows, includes the Pilgrim Gardens development (Horse & Jockey site) and land at and around the bungalow called Alderwood and the former Vicarage.

15.2.2 Table 1 below summarises the relevant information in the SHLAA, which formed part of the evidence base for the Local Plan.

SHLAA ref	Owner	Gross area (ha)	Available area (ha) for development	Net development area (ha)	Dwellings yield at 30 dph
16263	Methodist Church (Agent - Anwyl)	4.75	3.1	2.32	70
16262	TW	12.5	12.16	9.12	273
16256	Peel L&P (some) & Richard Nuttall (some)	3.69	2.79	2.09	63
TOTALS		20.94	18.05	13.53	(406 'rounded' to) 400

Table 1: Summary of information in SHLAA about H66

15.2.3 Table 7 in Policy HS2: Housing Site Allocations shows the net developable area of H66 as 13.74ha rather than 13.53 ha, but this is probably explained by the inclusion of the Horse & Jockey site. Table 7 contemplates a yield of 29 dph at H66, resulting in 400 dwellings.

15.3 The density of 35-40 dph for Village Streets (unnumbered page 84) is extremely concerning, as it is up to 38% more than the density for H66 in the Local Plan. The stated reasoning and influences are:

Reflects proximity to services & public transport network

That looks as if the authors of the Masterplan are seeking to take advantage of a potential ambiguity in the Local Plan, about which ECNF made representations during the Examination. The ambiguity lies in Policies HS2 and HS4 and paragraphs 120, 125, 140 and 141 of the Local Plan.

15.4 Table 7 in Policy HS2: Housing Site Allocations posits a density of 29 dph for H66. Paragraph 120 says that H66 will require a well-designed scheme that responds to the site's context and makes the most of the environmental assets. Paragraph 125 provides:

Any proposed development must make a positive contribution to the local environment and consider the site's form and character, reflecting the setting of features such as the Grade II* Listed Edenfield Parish Church and incorporating appropriate mitigation. Development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance. The development must be in accordance with an agreed Design Code/Masterplan across the whole development. The layout should be designed to allow glimpsed views towards the Church to continue, for example, by aligning the principle road(s) along a north- south or north east – south west axis, and building heights restricted.

15.5 Policy HS4: Housing Density provides:

Densities of at least 40 dwellings per hectare should be provided within town and district centres.

The density of the development should be in keeping with local areas and have no detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of an area.

The first sentence of that policy is not applicable to Edenfield, as it is not a town or district centre, as defined in Strategic Policy R1: Retail and Other Town Centre Uses, but the second applies to all housing development. Paragraphs 140 and 141 read as follows:

140 Densities in excess of 40 dwellings per hectare will be expected to be delivered in town centres within Rossendale. Other sustainable locations where higher densities will be expected include sites within the urban boundary and within reasonable walking distance to bus stops on key corridors such as the X43 and 464 bus routes. Inclusive Mobility – Gov.uk propose that 400m walking distance to a bus stop as a suggested standard. High quality design can ensure that high density proposals are good quality schemes.

141 It is recognised that housing densities will be lower in other areas of the Borough because of physical constraints and on site issues, for example, topography, areas at risk of flooding and landscape.

Site promoters might be arguing here that paragraph 140 supports high-density development at H66 because it is within the urban boundary and within reasonable walking distance of bus stops on another key corridor and because the paragraph points out that high density and good quality are not mutually exclusive.

15.6 However, the fact remains that, taking the Local Plan as a whole,

- it clearly identifies a density of 29 dph for H66
- paragraph 120 says that H66 will require a well-designed scheme that responds to the site's context and makes the most of the environmental assets
- paragraph 125 requires development of H66 to make a positive contribution to the local environment and consider the site's form and character, and to be be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance
- Policy HS4 requires development to have no detrimental impact on character, appearance, distinctiveness and environmental quality of an area; and
- paragraph 141 recognises that densities may be lower because of physical constraints and on-site issues, for example, topography and landscape.

15.7 In short, the proposed density of 35-40 dph for the Village Streets area does not respond to the site's context and fails to make the most of H66's environmental assets. The stated reasoning (*Reflects proximity to services & public transport*) is irrelevant.

15.8 Table 2 below summarises the densities of development clusters near H66 as shown on pages 29 to 31. Additionally it shows the densities of a couple of recently approved developments nearby and the density shown in the Local Plan for site H65 on the other side of Market Street. Only three of the sites have a density of more than 30 dph. Two of these (Market Street and Bolton Road North) are distinguishable as they feature long terraced rows on a main road. The Pilgrim Gardens development includes a short terrace fronting a main road. Pilgrim Gardens should not be regarded as a precedent for a high density on H66. It is easily distinguished from H66 (although RBC wrongly insisted at the Local Plan Examination that it was part of H66 and the Policies Map wrongly shows it as such), as it was a windfall brownfield site with a disused

public house, it was very small compared with H66, it was never in the Green Belt and, when planning permission for housing was granted, it was not subject to any policy requirements such as those in the SSP.

Location	Density (dph)	Source	
Moorlands View, 14/16 Crow Woods and 57-61 and 97/99 Burnley Road	30	MDC, page 29	
24/26 Blackburn Road, 21/23 Burnley Road and Esk Avenue	13	MDC, page 29	
Church Court and 2 Church Lane	21	MDC, page 29	
Alderwood Grove and 115-129 Market Street	25	MDC, unnumbered page 30	
49-77 and 58-82 Market Street	45	MDC, unnumbered page 30	
24-46 & 69-95 Eden Avenue and 2-6 Highfield Road	28	MDC, page 31	
Acre View and 1-45 & 30-58 Bolton Road North	39	MDC, page 31	
Site of Hawthorn House, Rochdale Road	18	Planning application 2021/0454	
Pilgrim Gardens and 79-85 Market Street	43	Planning application 2015/0238	
Land east of Market Street (H65)	29	Local Plan, Policy HS2, Table 7	

 Table 2: Selected comparative densities of development near H66
 Image: H66

15.9 The Chatterton South Area Codes (unnumbered page 86) contemplate a density of 36-45 dph, up to 55% more than the Local Plan indicated. The reasoning and influences for this are:

Visually discrete setting within Edenfield provides opportunity to maximise density in a location close to services & public transport.

It is not clear why a visually discrete setting should be an acceptable reason for cramming dwellings together. The density is excessive. Nor is proximity to services and public transport any justification for cramming. Paragraphs 15.3 to 15.8 above apply to Chatterton South as well as to Village Streets.

15.10 Unnumbered page 88 identifies a density of 30-34 dph in Edenfield North. That seems excessive, given The Local Plan's expectation of 29 dph in H66 as a whole. It means that the MDC proposes a potential density of more than 29 dph in all four Areas. The reasoning and influences for the density in Edenfield North are said to be

Lower density than Edenfield Core to reflect position at northern fringe of Edenfield

This makes no sense, as the proposed density of Edenfield Core is the lowest of the four areas at 26-30 dph.

16 Equality and Human Rights

16.1 In addition to the specific plight of disabled residents in existing houses raised at paragraph 11.9 above, there are wider equality and human rights implications for Edenfield as a whole.

16.2 The masterplan focuses on the proposed development and protected characteristics (including but not limited to age and disability) of prospective residents of H66 to the detriment of existing village inhabitants. For example, disability access is mentioned for new houses, as are width of streets, vehicular access and driveway widths, but residents who are elderly, frail or disabled in existing houses face potential safety risks from new junctions to facilitate development of the site and the general increase in traffic.

16.3 No account is taken in the MDC of the effect on people's physical and mental well-being arising from worry about or caused by the development, which may be exacerbated by a protected characteristic.

16.4 The issue of schools for children and young people is also neglected within the Masterplan and affects both current and prospective residents. The probability is that as development of H66 progresses, not all Edenfield children of primary school age will be able to attend a local school (Edenfield CE PS or Stubbins PS.)

16.5 RBC has an obligation under section 149 of the Equality Act 2010 (the Public Sector Equality Duty) to have due regard to equality considerations when exercising their functions. As a way of facilitating and evidencing compliance with that duty, RBC is urged to conduct an Equality Impact Assessment of the MDC. to ensure that this is undertaken and that measures are considered: -

- to eliminate unlawful discrimination
- to advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

16.6 There is an inherent danger of becoming fixated on development of H66,, to the exclusion of the duty under the Equality Act 2010.

16.7 The Equality Impact Assessment should be informed by evidence of impact, with all design decisions (and the reasons and evidence behind them) documented contemporaneously and transparently, making it clear how the needs of all modes and users have been considered. This should incorporate the whole of Edenfield, not just H66 and have full regard to existing residents as well as prospective residents of H66.

Richard W. Lester for self and on behalf of Edenfield Community Neighbourhood Forum

11th August 2023

APPENDIX

Extract of map of Public Rights of Way in Edenfield

Paragraph 7.4



EDENFIELD COMMUNITY NEIGHBOURHOOD FORUM (ECNF) JULY/AUGUST 2023 CONSULTATION TRAFFIC SUBMISSION re TAYLOR WIMPEY MASTERPLAN and PLANNING APPLICATION 2022/0451

<u>GENERAL</u>

An initial point to appreciate is that the issue of transport/traffic in conjunction with the H66 site has been raised many times by ECNF over recent years, in particular the need for firm proposals. It is true that the recent submissions have, at long last, provided some more detailed information but it is still very much short of a comprehensive plan. In many ways little has changed and the concerns raised both by ECNF and Edenfield residents still apply such that comments and objections previously made are still relevant and should be considered alongside any further comments/objections submitted in response to the latest proposals.

The comments in this document have been produced to reflect the views of Edenfield residents and are supplemental to the more technical points made on behalf of ECNF by SK Transport. A Residents event was held in the Edenfield Community Centre where feedback on the proposals was requested either verbally or in writing. The responses received in writing are attached to this submission (names and addresses have been redacted for the purposes of maintaining privacy).

PUBLIC TRANSPORT

There seems very little information supplied on the issue of Public Transport other than that it is clear there is no intention of expanding bus routes into the new areas of housing. The only actual comment made in respect of Public Transport is that the Pilgrim Gardens bus stop is to be moved to an unidentified location which, realistically, means it is to be removed altogether. No new facilities other than houses, roads and a small car park are proposed so all requirements of the new residents will involve off site travel. Whilst there are bus services through the village the usage thereof is very low compared to car usage. This position will deteriorate further with houses some distance from bus stops, one bus stop to be, at best, moved to an inconvenient location and the opportunity being missed to improve local facilities such as healthcare, schools (as far as this application is concerned) and retail outlets.

TRAFFIC CENSUS

It is noted that a Traffic Census was undertaken in April 2023. It is really not helpful to the credibility of the data collected that it doesn't cover a whole seven day period of activity. What about Monday, considered by many to be the busiest travel day and what about Sunday, the busiest day in Edenfield for on street parking?

There is also concern that "It is anticipated that the allocation will be completed by 2030" (paragraph 1.15 of the Highways Consideration of Masterplan). This seems extremely optimistic and it is felt that a more realistic view would be achieved by using 2040.

A further concern is that to predict trip rates "the highways officers at LCC have requested that the trip rates as per those used for North-West Preston should be adopted" (paragraph 1.25 of the Highways Consideration of Masterplan). The comparison area needs to be identified more specifically for any meaningful interrogation as to its suitability to be used in the case of Edenfield. A general comment at this stage would be that the North West Preston area seems potentially to be much more of an urban area than Edenfield and is likely to be far better served by bus and rail services than those available to residents of Edenfield. As such there is concern that the number of projected additional vehicle journeys is being underestimated.

MARKET STREET

As is well documented the Market Street corridor in Edenfield is a funnel for traffic with routes in the South converging from Rochdale, Bury and Ramsbottom at the Market Place mini roundabout and with routes in the North from Haslingden and Rawtenstall converging at the traffic light junction close to the primary school and church. If the A56 is closed, blocked or experiencing slow movement then traffic leaves the A56 and the only viable alternative route is through Edenfield.

At the Southern end of Market Street are local businesses (including a bakery, butchers, two hairdressers, pharmacy, food takeaway and The Rostron Arms public house). Along Market Street are the Drop Off Café and several other businesses located in the former Co-op building. At the Northern end are The Coach public house/restaurant, the local primary school and Grade 2* listed church. Market Street is mainly a street of traditional terraced properties many of which do not have private parking arrangements and consequently on street parking is essential for residents to safely and comfortably enjoy their homes. This road has the highest level of traffic use in the vicinity of the H66 site but is

a B road in terms of its standard classification. However it is part of Lancashire County Council's Resilient Road Network and is the only route available for local traffic to journey from North to South of Edenfield and vice versa. It is a bus route, gritter route, refuse collection route, cycle route and, as well as motor cars, is used by agricultural vehicles, delivery vehicles, post office vehicles, milk delivery vehicles, heavy goods vehicles both on Market Street itself and for obtaining access to adjacent minor roads. It will also have to deal with construction traffic for the Taylor Wimpey site and potentially some of the construction traffic for other H66 sites. This usage is in an area that is the location of a considerable number of residential properties which, due to their high density level, generate a high number of both vehicle and pedestrian journeys.

Into the above scenario it is proposed that 400 dwellings be constructed immediately to the West of Market Street of which approximately 240 will access on/off Market Street by way of a single access point. There are also proposals in the near vicinity of the Taylor Wimpey site access point for a further 18 properties needing vehicular access onto Market Street from the site at Alderwood (planning application ref 2022/0577) and the site opposite Alderwood referenced as H65 in the Rossendale Borough Council Local PLan. The Applicant has rightly recognised the enhanced importance of Market Street by including in its proposals a gateway feature at either end. Taking all these factors into account Market Street should not be regarded as low traffic residential estate route and therefore the very best design practice should be followed in respect of any proposed changes.

In and within fairly close proximity to Market Street are approximately 600 dwellings. The proposed Masterplan under consideration involves the construction of about 400 new dwellings so a simple calculation indicates that traffic usage originating in the immediate vicinity will increase by 50% so a considerable intensification of usage on all local roads and junctions in respect of both vehicle and pedestrian journeys.

As reported in the SK Transport submission for ECNF a traffic survey in 2019 indicated about 8000 vehicle movements along Market Street per day. The information submitted by Eddisons (weekday am surveyed peak flows) indicates about 1500 vehicle movements between 7.45am and 8.45am and that 90%+ of these vehicle movements are in respect of through traffic. Some movements (maybe 5%) arise from residents departing from a parked position on Market Street and some movements (maybe 2.5%) arise from vehicles joining from side

streets (Exchange Street, Gincroft Lane, Heycrofts View, Alderwood Grove, East Street and Church Lane and from land situated between terraced blocks of houses used for parking and in the case of 51 to 77 Market Street garages located behind the terraced housing.

The above indicates Market Street peak am traffic of one vehicle every 2.5 seconds (3600 seconds divided by 1500 movements) most of which travel the whole length of the road. Traffic joining Market Street arises at the rate of about one every 90 seconds (3600 seconds divided by (1500*2.5%)) which residents advise is already very difficult to safely achieve. The TW site is projected to generate an extra 107 weekday am departures onto Market Street so one vehicle about every thirty seconds (3600 seconds divided by 107) which raises the issue of how this will be achieved safely.

HIGHFIELD ROAD PARKING

Highfield Road and adjacent/connecting roads (Eden Avenue and The Drive) are also residential locations and were designed as access routes for local residents to their homes and not as thoroughfares for traffic to/from other areas. The number of houses in this area is approximately 180. No information has been provided on the number of new dwellings proposed for this area but a figure of 90 has been previously mentioned so a likely increase in journeys of 50%. There is, therefore, concern that significant additional traffic will arise on these routes from the Anwyl site which may affect safety and the availability of on street parking.

It is noted that details of current parking capacity for Highfield Road have been supplied in Appendix 1 of the Response to LCC Report Note. There is no reference to this location in the Highways Consideration of the Masterplan document. In view of the increased traffic which will arise from the Anwyl site on Highfield Road (and also Eden Avenue and The Drive) it seems reasonable to expect to see in the Masterplan the information to support the conclusion that these roads can cope with the increased traffic expected and retain all existing on street parking. This needs to be part of the Masterplan and not something left to be found necessary at some future date.

EXCHANGE STREET

The proposal to make it one way is presumably in recognition that exiting onto Market Street, close to the pedestrian crossing and where there are severely restricted views, is far from ideal. There also seem to be parking proposals but these are far from clear but, based on the faint yellow line shown on the Applicant's Proposed Highways Improvement Plan document, seem to involve the loss of residents' on street parking. Sadly the proposals on this corridor are far from clear and again the credibility of what is proposed is not helped in that the Proposed Highways Improvement Plan document does not include the Edenfield Pump (bike/skateboard) Track and its entry/exit onto Exchange Street. In respect of the Pump Track it should be noted that it has proved very popular and this means more cyclists using not only the Track itself but also the local road network, in particular Exchange Street, Highfield Road, Bolton Road North and Market Street.

EXCHANGE STREET JUNCTION WITH HIGHFIELD ROAD AND ANWYL DEVELOPMENT

It seems likely that this junction will see a significant increase in activity. Using the figure of 90 as the likely number of dwellings which may be built on the Anwyl site it is thought that a fair rough estimate of the number of daily journeys passing through this junction would be approaching 500. There are serious concerns about its direct proximity to the Pump (bike/skateboard) Track (in particular its entry/exit point) and close proximity to the Childrens' play area and Recreation Ground. The Forum believes this arrangement should be considered as a brand new junction and potentially would fail a Road Safety Audit so therefore such an audit should be undertaken before any Masterplan/Planning Applcation is considered any further.

BURY ROAD/BOLTON ROAD NORTH

As with the Highfield Road area, issues in connection with Bury Road and Bolton Road North appear to have been ignored. These routes are also the location of terraced properties and similar issues arise for residents as for those on Market Street. These areas should be considered as part of the Masterplan process and issues of traffic flow and parking resolved now.

MARKET PLACE MINI ROUNDABOUT

This is already a busy junction at peak times and has to accommodate traffic on the Primary Route (A680/A676) and Lancashire County Council's Resilient Route Network. In view of the increased traffic arising from the proposed three new significant developments in Edenfield it seems reasonabe to expect a Road Safety Audit to have been performed on this location at the Masterplan stage to demonstrate its ability to operate safely by reference to current standards. Issues already arise in respect of (i) the pedestrian crossing near to this junction (ii) queuing traffic arising on the approach from Rochdale Road (iii) traffic leaving the junction struggling to travel south down Bury Road (iv) visability issues for traffic arriving at the junction from Rochdale Road (v) visability issues for traffic arriving at the junction travelling north from Bury Road and (vi) difficulties experienced by heavy and sometimes quarry vehicles turning from Rochdale Road into Bury Road and vice versa.

FOOTPATH 126

This footpath (from Market Street, west past Mushroom House and across the centre of the Taylor Wimpey site and then by bridge over the A56 to farmland and properties at Alderbottom) is likely to be used to a much greater extent than at present such that its mixed use by vehicles and pedestrians is likely to cause safety issues. To reiterate information previously supplied the first part of Footpath 126 is used by Mushroom House as its access route. In addition there is farmland and two residential properties (Alderbottom Farm and Swallows Barn) situated on the west side of the A56 which use the whole length of Footpath 126 as an access route.

In addition no consideration appears to have been given as to how Footpath 126 will interact as it crosses the North/South traffic primary vehicle access road which the Adoptable Highways Plan indicates will take place adjacent to the point an East/West estate road also crosses the primary vehicle access road. What will stop residents from the Taylor Wimpey site accessing Footpath 126 with vehicles to access Market Street especially at busy times?

MARKET STREET PARKING

It is dissappointing that the Highways Consideration of the Masterplan makes almost no comment on the issue of increased parking restrictions on Market Street other than to indicate that they are proposed. Similarly, the Response to LCC Report Note document also makes very little reference to parking issues other than to repeat the information in the Highways Consideration of the Masterplan and provide in Appendix 1 some Google Earth screenshots of various parking zones and a summary of the Total Number of Spaces (337) broken down into 21 zones of which 10 are on Market Street. Reference is made to parking survey data in paragraph 1.18 which is that presumably on page 66 but no interpretation thereof appears to have been made.

Of the ten existing parking zones on Market Street it seems that it is proposed three will be lost (E, I and M) involving 51 spaces out of a total of 147 so roughly 35%. It is acknowledged that three new parking areas are proposed. However
two of these (on Burnley Road adjacent to the school and at the bottom of Exchange Street) are geographically removed from Market Street and there is very little detail as to how these will be delivered. A third parking area is proposed with thirteen spaces in the field adjacent to the Taylor Wimpey site access road. This is certainly more relevant to Market Street residents but it will not replace the on street parking they have enjoyed over many decades outside their front door. The provision of only 13 spaces is also clearly inadequate especially when some spaces may well be used by visitors to the Taylor Wimpey properties, some may well be used by day commuters from elsewhere using bus services from Edenfield to travel to work and some may be used by visitors to The Coach/The Drop Off Café. Furthermore the 13 spaces proposed are located in an unsecure open area with limited lighting and there are no spaces identified for use by those with disabilities.

It is also unrealistic to rely on parking restrictions in a heavily populated residential area to improve the flow of traffic and/or improve traffic safety since such restrictions do not apply to blue badge holders/those dropping off or picking up passengers/those unloading/loading or, in practice, to those ignoring the restrictions especially for short periods of time.

The use of the above mentioned field for a parking area detracts from the Applicant's claim that it represents an open space and it may adversely interfere with the operation of the Market Street junction (see below). There is also the issue of electric vehicle charging facilities to which, in the not too distant future, access will be required for all residents.

MARKET STREET JUNCTION

This is the most significant change proposed and involves a priority right turn to ease traffic flow. Traffic will enter from both directions on Market Street onto the proposed Taylor Wimpey development. A detailed plan of the proposed layout is included at page 18 in the Response to LCC Report Note. Yet again, it is not helpful to the credibility of this document that it is out of date as it does not include the properties located very close by to the proposed junction at Pilgrim Gardens or the junction from Pilgrim Gardens onto Market Street.

The site access is proposed to be directly opposite an access area (adjacent to 102 Market Street) to properties opposite the proposed junction on the East side of Market Street. How is this access area supposed to operate when travelling northbound along Market Street without potentially encountering a vehicle in the ghost island of the site access? This will result in crashes!

The site access is also very close to private driveways located at 98/100 and 115 Market Street. These driveways are narrow and not easy to enter/exit at the best of times so the proposal that residents at these locations will also have to deal with the effects of increased traffic and a right turn junction is most unwelcome and potentially dangerous. Similar issues also arise in respect of vehicles using the Footpath 126 exit onto Market Street and such issues may also affect vehicles using the Alderwood Grove and Pilgrim Gardens junctions.

A number of houses get their bins collected from the roadside end of the above mentioned access area (adjacent 102 Market Street) once a week. The refuse vehicle would have to park in front of the pedestrian crossing (blocking the road), putting residents in danger as pedestrians would no longer be visible using the pedestrian crossing. This must be a highly dangerous arrangement.

The site access is proposed onto Market Street, a highly trafficked, heavily parked upon, Designated Diversion Route for National Highways (when the A56 shuts), informal diversion route for modern sat navs when the A56 is experiencing slow traffic and key route for the many agricultural and large vehicles in the area. Market Street is also a bus route, gritter route, refuse collection route and key route for cyclists that is used by both commuters and for recreational purposes (being a hub for mountain biking in the area and also the location of the Drop Off Café a destination specifically promoted as cycle friendly).

A site access from a heavily trafficked road into a development of such a large scale should be constructed to meet the very best design practice. If Rossendale Borough Council/Lancashire County Council don't ensure that this is the case, they are putting the lives of residents, vulnerable road users (cyclists) and pedestrians including the primary school children (accessing the school just 250m from the site access), at serious risk/danger of fatalities. In particular it has been suggested the following should occur:-

- Due to the number of houses on the site and the number of vehicle trips per day generated the site access must have an absolute minimum of a 35m ghost island.
- The access must have safe crossing for pedestrians and therefore must provide a minimum 2m wide pedestrian island, both across the access and across Market Street

- Due to Market Street being a Bus Route, Refuse Collection Route, Heavy Goods Route, Agricultural Vehicle Route, Strategic Highway Diversionary Route, and Gritter Route, the through lanes of the ghost island must be at or near the maximum width of 3.65m in order for buses/commercial vehicles to pass safely
- The eastern side footpath needs to be widened to 2m to allow safe usage.
- Any changes to the western side footpath need to adhere to it being 2m wide.
- The priority turning lane must be a minimum of at least 3m wide.
- Because Market Street is a 30mph route, all tapers should be a minimum of 1:20.

All of the above are the **absolute minimum requirements** that need to be achieved

for the traffic types involved on Market Street and must be able to fit into the development or adopted highways. **UNDER THE CURRENT PROPOSALS THESE MINIMUM REQUIREMENTS ARE CLEARLY NOT ACHIVEABLE.**

The sketch below shows the absolute minimum design requirement on the (out of date but as used by the Applicant) OS mapping and the site layout. The area hatched in red is where the ghost island would have to tie into in advance of the junction. The areas hatched in blue/red shows where the widening would need to run through private houses. The minimum requirement would be extended far beyond this and is outside of the development and adopted highway. It is thought the current proposals would fail a Road Safety Audit so therefore such an audit should be undertaken before any Masterplan/Planning Application is considered further.



Lancashire County Council/Rossendale should not approve the current proposed layout because they would be approving of something that is undeliverable and is going to potentially result in serious injuries and even DEATHS!!!!

If Rossendale Council/Lancashire County Council are to truely maintain the safety of their road users and residents, they must not just accept the minimum design requirements, but they should be requiring a 3m wide ghost island, with a 45m long access and with maximum width through lanes and a 3m wide pedestrian island.

MARKET STREET/CHURCH LANE/EAST STREET/BLACKBURN ROAD/BURNLEY ROAD

Obviously a complicated area of the road network already partly controlled by traffic lights, adjacent to the church/primary school and subject to heavy on street parking especially at school opening/closing times (subject to a potential significant increase if, as may occur, the school is expanded to accommodate additional children from the H66 development). A proposed uncontrolled crossing is suggested presumably in response to increased traffic and increased

numbers of school children needing to cross the road at this location. However the design of the crossing will potentially interfere with the ability to enter/exit East Street and Church Lane.

It is acknowledged that additional parking is proposed adjacent to the school accessed from Burnley Road but this creates a further junction close to the existing junction. It also would be located in a Green Belt area and is not in accordance with the Local Plan. It is also doubtful whether it would provide sufficient parking to deal with the needs of parents/carers at the beginning/end of the school day.

None of the above is considered in the revised Masterplan when what is required is a detailed analysis, reasoned proposals and a safety audit of such proposals.

EQUALITY ACT/HUMAN RIGHTS etc

Residents are feeling badly treated over the whole process and that much of the current proposals are focused on the needs of potential new residents to the extreme detriment of current residents. Surely existing residents should be considered equally alongside new residents.

There is no indication as to how long construction work will take and no plan in respect of phasing construction work or for how the village will cope with such work on three and up to possible five different sites at the same time (and also quite likely coinciding with significant construction work very close by to be undertaken by United Utilities on the Haweswater Aqueduct). Such an imposition seems totally unreasonable and contrary to the right to a peaceful enjoyment of an individual's property.

There is also no plan as to how construction traffic will be managed and how Blackburn Road, Market Street, Bury Road, Bolton Road North, The Drive, Eden Avenue and Highfield Drive will cope with heavy goods vehicles trying to access the various construction sites all potentially at the same time. The village has already had to deal with significant disruption as a result of constuction works at Pilgrim Gardens and on Rochdale Road which have yielded less than 20 properties. It is now faced with years of disruption, noise, road chaos and pollution followed by parking restrictions, one way street arrangements, more traffic on already congested roads, safety issues and local education/health services being overwhelmed. There is, or there is certainly percieved to be, discrimination against existing residents in respect of the proposed parking arrangements (and in respect of other issues) which may contravene the provisions of the Equality Act 2010.

The hardship caused by the removal of on street parking (and indeed other aspects of the proposals put forward) could also be a breach of the Human Rights Act 1998. These issues need to be addressed. It is appreciated that the rights of the individual (or group of individuals) has to be balanced against the public good but the proposals as put forward are considered to be too much weighted in favour of development. Many residents feel that, in overall terms, the public good could be better served by much less development in Edenfield and development elsewhere on more suitable sites.

As a Public Body it is incumbant on RBC that at the appropriate time it will review these issues in the prescribed manner as part of its decision making process.

SUMMARY

- Still no Masterplan other than in name only.
- Credibility issues in respect of key documents.
- Insufficient consideration of traffic/transport issues on a holistic basis.
- Insufficient details in many respects.
- Road safety concerns.
- Pedestrian safety concerns.
- Market Street proposed junction fails to comply with regulations.
- Unfair treatment of existing residents in respect of on street parking.
- High levels of construction traffic on busy roads in existing residential areas.
- Overall impact causing excessive hardship for existing residents.
- 11 August 2023 compiled by M J MacDonald on behalf of Edenfield Community Neighbourhood Forum based on feedback and comments received from Forum members and the residents of Edenfield.

APPENDIX attached

Written comments from attendees of residents' event held 15th July 2023.

APPENDIX

RESIDENTS COMMENTS AT EVENT HELD 15TH JULY 2023

Part 1 of 2

290



Name:	
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Feedback for the Forum	
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What fist assessments / modelling has been clare to ensure that road safety is not componiesed?



Name: Address: +71414 **Contact Number:** Email: Please tick one or more of the appropriate poxes D **Questions for the Forum** W How will these proposals affect you? Feedback for the Forum Please can you include horse riders when you mention sayely concerns on the roads. There are quite a few horse riders who go through the village to access the National trails and Holcombe hill. We frequently ride through Chatterton Hey and up by the Mushroom house Q Are there any plans to designate this as a bridlency? We have user evidence to prove use of these routes for decades

Name: Address: **Contact Number:** Email: Please tick one or more of the appropriate poxes DY **Questions for the Forum** P How will these proposals affect you? Feedback for the Forum 0 O avarenteed parking for residents they intend 6 double line? Q Electric Charging points, how will be chage if cars aren't outside house? (3) will verdents be concensuted for (or) of Value to property 1 live 116 market street Arready shoggle with Paking. How will I charge my car if I Cent pak arbide house. Madar cancerns about subely esp. for my child. In currently yping up my letter to cancil. Keep up good work



Name: Address: **Contact Number:** Email: Please tick one or more of the uppropriate boxes Questions for the Forum HE How will these proposals affect you? Feedback for the Forum Yellow lines on Marhet Street unl greating affect brade. Personally, I can't always walk into the minape due to a leg injury or arthoitis - there fore on those occasions I wouldn't be able to drive. park autside the shaps to collecte medication a visite other shops (butches - bakers) that I use. Batton Road North is already danperous with theirs heavy peak time traffic + quenes whenaver there is stalematic in the vulage due to extra traffic eithe from the buy-pass or just tach of passing space on Makek Streak. How chaotic would it be with all the extra traffic from the new harsing? And why, should locals be discrimited against just so that other people can come to the nilage - especially since we are already being robbed of an grean best land? The whole traffic issue is a major a worrying cancien too all current residents. This are larely village will be nured beyard repair with the consequences of these

developments.



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Name: Address: **Contact Number: Email:** Please tick one or more of the appropriate boxes **Questions for the Forum** How will these proposals affect you? P Feedback for the Forum Kids playing out Parking Traffic Increase on a residential street. School Parking Access to concineties (chippy, chemist) Speeding Traffic 24/7 with ortra vehicles

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APPENDIX

RESIDENTS COMMENTS AT EVENT HELD 15TH JULY 2023

Part 2 of 2



Address: Contact Number: Email: Please tick one or more of the appropriate boxes Questions for the Forum How will these proposals affect you? Feedback for the Forum Why event they building horises like the ones proposed clean blackburn Rd.? Why us there no parking contride 102 a halfway in front of 104? They built the motorway to allewate the traffic on Market St so what will Market St be like now, you can wait 10 mins to cress now. What about children going to school Will there be sufficient parking for honges epposite the entrare to the side espesially for these with children is disabled?	Name:	
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Name: Address: **Contact Number:** Email: Please tick one or more of the appropriate boxes **Questions for the Forum** P How will these proposals affect you? Feedback for the Forum As residents of Tum Village, we may not be directly affected, however, we will be affected by the increase in traffic in Ederfield which will compremise across to businesses e.g. the phurmacist and access to Rawhenstall. The A680 is a through route low Rochdole and is heavily used, for those travelling, towards Ransbottom and Bury, they would usually write Ederfield vonte, however, during hows of congestion (when there was bongten road wachs a Rochelake Rd adjacent to the quarry road), Bleakhold Rd became a 'vat run' for people accorning Shultleworth. This needs to be considered. Finally, the proposals for the reacts in Ederfield hade not taken any areand of current vosidets or basmenses. To som it developments of this size without taking account of the in part on the account structure of the village is inforgivedble To have indated parting for residents in inpractical. Take are look at the village now, its full already! I doubt anyone would want to live in the duckgonents as currently prepased!



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Questions for the Forum	
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Edenfield Community Neighbourhood Forum

Land West of Market Street, Edenfield

Planning Application 2022/0451 and Edenfield Masterplan and Design Code

Edenfield Community Neighbourhood Forum (ECNF) has submitted representations on the both the amended Masterplan and Design Code for Land West of Market Street (Allocation H66) and amended Planning Application 2022/0451, both of which were published for consultation in June 2023

ECNF has received confirmations of support for these representations from 409 individuals who reside in Edenfield and from 22 individuals who reside outside Edenfield. The names and addresses are listed below.

Christian						
name	Surname	Address - street	Post code	Town		
Edenfield residents						
Margaret	Armstrong					
Nicholas	Arpino					
Lee	Ash					
Christine	Ash					
Peter	Ash					
Joanne	Ash					
Alan	Ashworth					
Carol	Ashworth					
Thomas	Axon					
Justin	Axon					
John	Ayers					
Joanne	Bardney					
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Jennifer	Barnfield					
William	Barnfield					
Granville	Barrow					
Patricia	Barrow					
Russ	Bates					
Sheila	Bates					
Lesley	Batt					
John	Batt					
Sue	Bellow					
А	Bentley					
Rachelle	Berrisford					
Margaret	Bipham					
Christine	Bishop					

Christopher Richard Sarah James Katie Geoff Christine Gerald Hilary Rebecca Paul Angela Gaynor Vince Kate Stanley Jean Diane Т ΡM НW DJ J Nicholas Shirley Keith Kathleen Laura Alison Steven Joseph Μ JΤ Janet Colin Matthew James Moira Christine Kevin Elias Athina Martin Carole Kathryn David Paul Annabel

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Tony Paul Oliver Charlotte Joseph Amy David Sue Jill Brian Victoria Daniel Rita Simon Joyce Laura Lesley James В William Е RΙ Christopher Adele Charlotte Stephen Peter Frances Peter Karen Sophie Carl Heather Hayley Robert G C ΝJ Steven Carole Mark Simon Richard Gillian Maureen Kenneth Barbara Daphne Roy

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Resident outside Edenfield

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SK Transport Planning Ltd Albion Wharf Manchester M1 5LN

www.sktransport.co.uk

Rossendale Borough Council Room 120 The Business Centre Futures Park Bacup

9 August 2023

Dear Sir/Madam,

RE: PLANNING APPLICATION 2022/0451 - LAND WEST OF MARKET STREET, EDENFIELD

We are writing to you again on behalf of the Edenfield Community Neighbourhood Forum (ECNF), following the submission of a revised full planning application by Pegasus Group for the erection of 238 no. residential dwellings (Use Class C3) and all associated works, including new access, landscaping and public open space at the above-mentioned site.

You will recall we wrote to you in January with our technical review of traffic and transport matters, the majority of which covered the information requests that were set out in the Local Plan Examination, alongside the volume of additional questions and information that the Inspector requested on the proposed housing site allocations during the life of the Examination.

We made the point at the time that the level of additional information requested by the Planning Inspector at that time on fundamental technical matters did not inspire confidence to the group that the Draft Local Plan, which has now been adopted, has been assembled in a robust and accurate way. The group's position remains unaltered now that the above planning application has been submitted. Even with the submission of additional technical information there are a significant number of technical matters that have not been addressed and, in our professional opinion mean the application cannot be determined in a positive manner. We expand on these technical points later in this formal response.

As a reminder RBC, as the Local Planning Authority, were very clear that with regard to traffic and transport matters the residential development proposals could only be supported if:

- 1) the comprehensive development of the <u>entire</u> site (our emphasis) is demonstrated through a masterplan with an agreed programme of implementation and phasing;
- 2) The development is implemented in accordance with an agreed design code;
- 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:
 - a. 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;
 - b. 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.

The explanation for releasing this land for residential development was set out by RBC as follows:

"Exceptional circumstances have been demonstrated to support the release of this land lying between the A56 and Market Street in Edenfield from the Green Belt. The area is very open in character and allows views of the surrounding hills and moors and will require a well-designed scheme that responds to the site's



context, makes the most of the environmental, heritage and leisure assets, and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements.

Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Forum, to ensure a Masterplan is prepared."

RBC went on to confirm that as part of any future planning application the development proposals would need to be subject to a:

"....Scoping Study, a Transport Assessment and Travel Plan. This must be agreed with Lancashire County Council. Appropriate measures must be put in place to address any impacts the development may have on the strategic and local road networks. A Travel Plan will seek to ensure that the development promotes the use of public transport, walking and cycling."

In our previous response we, along with a number of other consultees set out our frustrations with respect to the level and quality of supporting information contained within the original planning application. RBC and LCC, as Planning and Highway Authorities could not have been clearer as to what technical information would need to be submitted with an application, and the thresholds that would need to be reached to make the development acceptable, including an expected package of mitigation works for the Market Street corridor. This requirement is not only set out in RBC's allocation of the site, but it was also verbally confirmed by Mr Neil Stevens, representing LCC at the Local Plan Examination in Public.

Alongside the ECNF's formal representations to the application, we are but one of a number of consultees who have questioned the level and quality of supporting information submitted with the planning application. To date other negative traffic and transport responses to the application have been received from:

- Rossendale Borough Council Planning Department
- Lancashire County Council Highways Department
- National Highways
- Bury Council

The frustration here is that the LPA set out exactly what was required in terms of a comprehensive masterplan, a Design Code, a Transport Assessment covering an impact assessment of both the 238 residential units and the other allocated residential sites, along with clear and concise information on the access strategy for the development. Even now, after the second tranche of technical traffic and transport information has been submitted with the application there are technical queries and information gaps that have to be addressed to meet both RBC and LCC's requirements.

This formal response has been prepared by SKTP to assess the additional technical submission documents for traffic and transport matters against the Planning and Highway Authorities requirements. Each technical matter is set out and discussed in detail below.

Development of a Comprehensive Masterplan, with an Agreed Programme of Implementation and Phasing

As set out in our January 2023 submission the first, and most obvious requirement from RBC and LCC was that the 400 residential unit allocation had to be considered in a comprehensive manner, and not 'salami sliced' by site promoters to avoid a cumulative assessment of the impacts of the allocation on the village.

The masterplan was expected to show:

- a) a comprehensive access strategy for the whole site, for all travel modes
- b) detailed assessment of all access points to and from the surrounding highway network
- c) a clear assessment of the impacts (in traffic and transport terms) of the 400 residential unit allocation on the surrounding highway network

d) a robust and deliverable mitigation strategy, to both promote sustainable travel to and from the site, and also mitigate the impacts of the development on the village, the surrounding highway network and the Market Street corridor, as stipulated by LCC at the EiP

The level of disappointment from ECNF that the applicant failed at the first hurdle to present this information in their September 2022 planning application was set out in our January 2023 response.

The latest technical submission does now include a Masterplan and Design Code, prepared by Randall Thorpe in June 2023, nine months after the original information was submitted to the LPA. Whilst this additional level of information is welcomed, the detail contained within it raises a number of questions, including:

- the detail of the main site access onto Market Street
- the delivery of the emergency access from the Taylor Wimpey to the Anwyl development parcel
- the corridor strategy for pedestrians, cyclists, buses and vehicular traffic on Market Street
- the delivery of the above-mentioned works as part of the various residential development proposals

As set out on page 46 of the Design Code the off-site highway improvements are directly linked to the residential allocation as a whole, and as such it is not possible to rely on the approach set out by the applicant, where they have stated:

"....off-site highway improvement measures which will be delivered alongside the development of the H66 allocation site (in line with criterion 3ii of Policy H66). Full detailed proposals will be worked up as part of subsequent individual planning applications."

Put simply, if the development is reliant on the off-site highway works to deliver a safe and appropriate access from the Market Street corridor then a detailed design, that can be properly assessed needs to be clearly presented in the submission. The various elements of the strategy need to also be linked to the different development parcels too.

For example, the Taylor Wimpey development parcel is clearly linked to the need to develop a new onstreet parking strategy on Market Street, but the submission documents offer no clarity over what off-site works will be delivered at each phase of the overall allocation works. Clarity is sought on this matter, along with confirmation on the detailed proposals for this corridor. Until this level of detail is provided the impacts and mitigation strategy cannot be fully assessed and confirmed.

Further detailed comments on the additional submission information is provided below.

Vehicular Access Matters – Market Street

The additional technical submissions provide further clarity of the Taylor Wimpey access strategy from Market Street. The scheme presented in the Design Code and on drawing 3806-F04 H show the access proposals but fail to take on board a number of the technical design points that were raised in January 2023 that should have been incorporated into the scheme.

We present the key design points again that need to be shown with the access design.

Widening of Eastern Footway on Market Street

Whilst ECNF are encouraged that the applicant noted the technical points made by the group during the Local Plan EiP, the ghosted right turn priority junction presented in drawing 3806-F04 H continues to omit the recommended widening of the footway on the eastern side of Market Street from 1m to 2m. This was shown in the ECNF submissions to the EiP and should be a requirement of any access design proposal.

This footway widening on the eastern side of Market Street is required to ensure that pedestrians and those with impaired mobility using this footway have an appropriate width to pass and not step onto the carriageway of Market Street. This requirement is amplified by the latest proposals showing on-street



parking formalised on the eastern side of Market Street. As proposed, the parallel parking bay, when used, will involve passengers opening vehicle doors onto a narrow 1m footway.

As previously set out this footway should be widened to 2m, to provide an appropriate width for pedestrians, and also a corridor that when used by motorists for parking will allow car doors to open across the footway without interfering with pedestrian access. As part of the overall junction design this pedestrian corridor improvement should be included, as the 'golden thread' of the NPPF is to promote sustainable travel. The applicant is of course fully aware of the requirement to enhance access by sustainable modes, as they reference Local Transport Plan (LTP) 3 in paragraph 4.3.4 in the TA, which states:

"In relation to improving people's quality of life and wellbeing the document recognises that 'fears about road safety and traffic speeds can deter people from walking and cycling' and suggests that this can be addressed by 'creating environments which are attractive for walking and cycling which also benefits social inclusion and cohesion.' Where appropriate the Council will expand the existing network of footways and cycleways to assist in creating quality neighbourhoods."

By ignoring the matter of widening the eastern footway on Market Street the access proposals cannot be considered compliant with LTP3.

Whilst it is not ECNF's responsibility to design the access arrangements for the applicant, it was previously identified at the EiP that the combination of widening Market Street to accommodate the ghosted right turn access arrangement, along with the requirement to provide 2m footways on both sides of the carriageway may result in challenges providing a continuous 2m footway at the northernmost point of the site frontage adjacent to nos.115 Market Street. We reiterate the need for this to be checked and confirmed in the submission documents.

Junction Visibility Splay Validation

In our previous submission it was recommended that the "Y" distance visibility splay dimensions should be calculated using recorded 85th percentile speed survey data, in line with CA185. With no speed survey data presented in the TA or additional submission documents there is still a requirement that the applicant validates their proposed 2.4m x 43m visibility splays against actual recorded speed survey data for this section of the adopted highway. The ECNF look forward to reviewing this data when it becomes available.

In the absence of any evidence presented by the applicant to date, reference is drawn to the ECNF seven day ATC data presented in their submissions to the EiP, which confirmed that in both directions on Market Street the 85th percentile speeds were in excess of 30mph, without any adjustment for wet weather speeds.

Displaced Parking on Market Street

During the Local Plan EiP ECNF made the technical point that any new access on Market Street would need the existing kerbside parking on the eastern and western side of the carriageway to be permanently removed, to achieve the required running lane and right turn pocket lane widths, as set out in CD123 Geometric Design of At-Grade Priority and Signal Controlled Junctions.

At the time members of ECNF who live locally in the village confirmed that the occupiers of the terraced properties parked on Market Street outside where they live, and as required would also park on the western side of the carriageway, on the opposite side of the road.

The submitted TA attempts to quantify the level of kerbside parking that takes place on this section of adopted highway and the latest parking beat surveys, undertaken between 20th and 22nd April 2023 confirm the significant volume of on-street parking that takes place on this corridor. As an example, the following on-street residential parking demand (recorded at 0730 hours on Saturday 22nd April 2023 was recorded in the following parking beat zones:

- G 6 vehicles
- H 20 vehicles



- I-5 vehicles
- J 8 vehicles

This equates to a total of 39 parked vehicles parked on-street in the immediate vicinity of the proposed main site entrance on Market Street. Applying a 6m bay space length would mean 234m of kerbside parking would be required in this location to accommodate this parking demand.



Figure 1: Extract from Applicant's Parking Beat Survey Data

Drawing 3806-F04 H shows a formalised parking bay on the eastern side of Market Street, from No.102 to 136a. This bay measures circa 86m in length. Further south an additional bay measuring 30m is provided in front of nos. 76 to 82 Market Street. Even with this combined kerbside parking this only equates to parking for circa 19 cars, a shortfall of 20 parking spaces against the existing parking demand on this short section of Market Street.

Whilst it is noted that the applicant is now proposing a 13 space car park for Market Street residents to use, this parking provision does not even meet the shortfall calculated on this limited section of the Market Street corridor.

Based on the above we request that the applicant confirms the following information, so an informed decision can be made on the impacts of the proposed main access to the development, and the impacts on parking for existing residents on this corridor. This review should confirm:

- the existing legal kerbside parking areas along the corridor (by length)
- the current parking demand in each of these parking areas (by vehicle)
- the proposed kerbside parking bay areas along the corridor (by length)
- the net surplus/shortfall in kerbside parking generated by the access proposals and required TROs

Until this information is provided it is not possible for RBC, LCC or ECNF to assess the overall impacts of the displaced parking on the local highway network, or the implications for existing residents on the Market Street corridor.

There is also a need to confirm that in order to maintain both the eastern and western kerblines free from parking and waiting of vehicles, and the provision of formal parking bays along the Market Street corridor

a Traffic Regulation Order (TRO) will need to be introduced. As these works are a prerequisite of the delivery of the access strategy there will need to be a TRO consultation undertaken and progressed outside of the planning application.

This is of course a separate risk for the applicant, and to avoid a situation where the scheme could be granted planning permission, only for the TRO to not be delivered it is recommended that the applicant undertakes the consultation in parallel with the planning application.

The required TRO, relocation of the bus stop, new formalised on-street parking bays and the application of one-way corridor proposals on Exchange Street will all require consultation with the Police, emergency services, local residents, bus companies, and local sustainable access groups. ECNF encourage RBC, LCC and the applicant to undertake this consultation during the life of the planning application, to ensure that the TRO can actually be implemented if the development proposals were to be granted planning permission.

The Need for a Comprehensive Corridor Assessment

ECNF are pleased that the applicant has looked to progress the development of a corridor assessment for Market Street. The proposed access, parking and traffic calming measures on drawing 3806-F04 H move this requirement forward and provide some level of scheme design for both RBC and LCC to consider.

The combination of gateway traffic calming measures, informal crossing points, formalised on-street parking and the ghosted right turn junction are the measures expected to make up the corridor improvement works. As highlighted earlier in this response there is a lack of clarity as to what elements of the corridor strategy will be delivered by each development parcel/phase, or whether all the works will be delivered before first occupations. As required by the RBC Local Plan clarity on these points would be welcomed by ECNF.

Notwithstanding the above there remain concerns over the delivery of the measures shown on drawing 3806-F04 H. As set out earlier the following matters do not appear to have been addressed when preparing the corridor proposals:

- a) that the corridor forms part of the local bus network, and needs to accommodate passing vehicles of this size
- b) Market Street has to accommodate diverted traffic from the A56 if there is ever a road closure on this section of the strategic highway network, and also has to cope with additional traffic when the A56 is busy and modern Sat Nav systems seek it out as an alternative route
- c) Market Street already accommodates a significant level of on-street parking (as confirmed in the applicant's parking surveys) related to the residential properties fronting this corridor and in respect of visitors to local shops and businesses
- d) The proposed ghosted right turn priority junction to the Taylor Wimpey site should be designed to CD123

Commentary on points a) to c) would be welcomed by ECNF, as there are concerns that the volume and on-street parking demands on this corridor have not been fully considered and assessed when preparing the corridor proposals.

In addition there is a lack of detail on the final measures that will be delivered if planning permission is granted. All the proposed measures need to be clearly defined, and in the case of works requiring a TRO consulted on during the life of the application, to ensure all the works and access strategy are deliverable.

Of even greater concern is that the proposed ghosted right hand turn priority junction to serve the Taylor Wimpey development has not been designed to the requirements of CD123. Whilst it is not the responsibility of ECNF to design the access for the applicant, we have previously highlighted the physical width constraints along Market Street, and the challenges delivering a design compliant junction in this location.

For ease of reference we provide an extract of the access proposals below, also with the detailed design requirements on running lane and right turn pocket widths for new accesses on the public highway. In summary CD123 states:

Paragraph 6.8 - At ghost island junctions on roads other than WS2+1 roads, the through lane widths in each direction shall be a minimum of 3.0 metres and a maximum of 3.65 metres wide, exclusive of hard strips.

Paragraph 6.10 - The minimum widths of right turning lanes (excluding those on WS2+1 roads), shall satisfy one of the following:

- 1) 3.5 metres; or,
- 2) 3.0 metres for new junctions; or,
- 3) 2.5 metres for improvements to existing junctions.

Note - A narrow right turn lane down to 2.5m wide is only for improvements to existing junctions where space is limited and it is not possible to widen the carriageway cross section, e.g. in urban areas where the carriageway is bounded by buildings.

Paragraph 6.10.1 - The widths of the right turning lanes should be in accordance with 1) for both new and existing junctions.

Paragraph 6.10.2 - Where it is not feasible to provide the widths of the right turning lanes fully in accordance with 1), the widths should be as close to 1) as practicable, but no less than 2) or 3) depending on whether the junction is new or existing.

As shown in **figure 2** below the proposed design does not meet the design requirements set out above for the width of the ghosted right turn lane. Paragraph 6.10 confirms 3m is the minimum width for a new junction, and is required to ensure a motorist can safely wait whilst turning right clear of oncoming traffic and to avoid vehicles blocking southbound ahead movements.

A 2.2m wide right turn pocket does not meet the requirements of CD123. It is 0.8m narrower than the <u>minimum</u> 3m wide pocket for a new junction.

In addition, with the access proposals not delivering a 2m wide footway on the eastern side of Market Street, the design as proposed cannot be considered appropriate to serve a new residential development of any scale.





Figure 2: Extract from Applicant's Corridor Improvement Strategy

We believe the reason why the applicant has chosen not to present an access design that complies with CD123 and shows the widened 2m footway on the eastern side of Market Street, the 2m wide parking bay and a 3m wide right turn pocket width is because this cannot be physically accommodated along the site frontage.

This matter was raised during the EiP discussions, in our original submissions to the planning application and are now presented again. It is essential that at some point during the life of the application the applicant confirms whether a CD123 compliant access scheme can be delivered on Market Street.

The Need for a Road Safety Audit

Based on the significance of the access proposals, and now the presentation of a corridor strategy for Market Street on this strategic route through the village, it seems appropriate that as part of the technical information submitted with the planning application a Stage 1 Road Safety Audit (RSA), along with a Response Report is required for all the access points and corridors where the development proposals will have an impact, or deliver mitigation measures. We would expect an independent RSA team to be appointed by the applicant, and their report to be circulated along with a Response Report. In parallel with this we also expect LCC's Highway Safety Team to also undertake their own independent RSA of the corridor strategy, and their findings to be reported back as part of the planning application review process.

As set out above, with the main development access from Market Street not being compliant with the junction design requirements set out in CD123 it is perhaps not surprising that a RSA has not been submitted with the application.

The combination of the design as presented not showing the widening of the eastern footway, the "Y" distance visibility splay dimensions not being validated, the right turn pocket not meeting the requirements of CD123 or a clear and robust assessment of the level of displaced parking not being presented confirms highway safety matters have not been satisfactorily considered in the submission material prepared to date.

Other Access Matters

As set out earlier in this report, the expectation was that any submitted planning application would include a full and comprehensive assessment of <u>all</u> access arrangements to the site. At the present time the only access that has been the subject of any level of detailed scrutiny is the proposed ghosted right turn access on Market Street, whereas the TA confirms that as part of the wider assessment a vehicular access will be required from the northern development parcel onto Blackburn Road, and likewise from the southern development parcel onto Exchange Street. The Taylor Wimpey proposals also place a reliance on an emergency access to the Anwyl land, which then will connect with Exchange Street.

From our review of the additional submission material presented by the applicant there are no GA drawings showing how these access strategies will be delivered, suitability of these access points to serve development traffic or the impacts on any existing on street parking in these locations.

The TA is also silent on the development phasing and the associated construction traffic movements associated with building out the different sites that make up the total residential allocation. As in ECNF's previous submissions it is requested that a clear and concise Construction Management Plan (CMP) is prepared and submitted to RBC and LCC for consideration. This document should clearly show the proposed access routes, compound locations, internal access routes and any mitigation measures required during the construction phases.

Exchange Street Assessment

ECNF has previously raised significant concerns regarding the use of this corridor approach, as matters relating to the use of Exchange Street to access the southern sector of the development allocation were flagged up during the Local Plan EiP.

The assessment presented by ECNF confirmed the eastern section of Exchange Street is narrow, experiences kerbside parking on both sides and has substandard visibility when exiting from the minor arm onto Market Street. This visibility from the minor junction arm cannot be improved due to the position of adjacent buildings in both the leading and trailing traffic directions.

This corridor also has the recreation ground adjacent to it, along with the recently constructed bike/skateboard pump track which has a direct pedestrian access onto the Exchange Street carriageway. On the other side of Exchange Street is a children's playground. All these uses generate significant pedestrian movements on this corridor, and by their very nature will attract vulnerable road users, in particular children/cyclists.

Concerns about using Exchange Street as a development access point were identified by LCC in their submissions to the Local Plan EiP, where they stated:

"there are a number of issues with the use of Exchange Street" as a development access route."

This matter has also been raised by RBC in their latest response to the applicant.

The matters that the Highway Authority raised at the time were:

- 1. The width is approximately 5 m with evidence of on street parking close to the junction with Market Street and further along which is possibly associated with the adjacent recreation ground and children's play area. This parking restricts traffic flow on the street.
- 2. There is no continuous footway to the site on either the north or south side of Exchange Street. There provision is considered essential for the development site to progress but may require third party land acquisition and dedication.
- 3. The junction of Exchange Street with Market Street is close to an existing zebra crossing and any additional movements at this junction are likely to increase the potential conflict between turning vehicles and pedestrians using the crossing facility.

As expected and highlighted in previous ECNF submissions it is noted that the applicant is now promoting an access strategy which requires the eastern section of Exchange Street to become a one-way street.

This expected access proposal was highlighted at the EiP, RBC, LCC and the site promoters, based on the existing sub-standard visibility at the Exchange Street/Market Street junction, along with the lack of continuous footways and on-street parking in this location.

This requirement now forms part of the corridor strategy for the village and will require a TRO to change the eastern section of Exchange Street from a two-way to one-way trafficked route. The additional material submitted with the planning application is silent on any consultation or detailed review of the implications of this proposal on residents and nearby local businesses.

As set out earlier in this response a full consultation on the required TROs to deliver all the measures contained within the corridor strategy, including the one-way access arrangements on Exchange Street must be undertaken before any decision is made on the planning application.

In addition, and of relevance to this technical point during the Local Plan EiP the site promoters discussed an alternative access strategy for the southern development site, whereby <u>all</u> development traffic would be routed onto the local highway network via the ghosted right turn priority junction on Market Street.

Clarification is sought as to whether this is still a consideration if the one-way access arrangements are not deliverable on the Exchange Street corridor, and whether this would affect the ability to deliver an emergency access between the Taylor Wimpey and Anwyl land.

It has been noted that the applicant's Transport Consultant has stated in their report that there is no junction or capacity assessment to undertake in this location. We dispute this and remind all parties that if a new vehicular access is to be provided in this location it will have a direct impact on traffic flows on Exchange Street, Highfield Road, The Drive, Eden Avenue and Bolton Road North.



Figure 3: Example of Existing Residential Parking on Highfield Road

These routes often experience a high level of on-street parking, and coupled with direct pedestrian access from the play area, pump track and recreation ground should be appropriately assessed, and form part of the RSA study area.





Figure 4: Bike/Skateboard Pump Track Access Directly on to Exchange Street

Until this technical matter is resolved, and the correct development traffic assignment data prepared it is our professional opinion that the full impact of the Local Plan allocation cannot be considered.

Access Matters relating to the "North of Church Lane" Site

As set out in the ECNF January 2023 submission alongside the lack of clarity on the proposed access strategy for the residential allocation via Exchange Street for the Anwyl land, it was highlighted that the TA was silent on the access strategy and potential impacts of the "North of Church Lane" site. The report also remains silent on the proposal for a new car park adjacent to the school, which creates a new access point close to the signalised junction, and may require the removal of existing on street parking, the impact of which should be assessed.

In the original submission the applicant focused heavily on assessing the development impact of the 238 residential units in the TA. It has taken both ECNF, RBC and LCC to remind all parties that the allocation was made "as a whole" to avoid the potential risk of a piecemeal development assessment. Whilst the latest submission documents have moved the assessment forward, there are still matters such as the overall allocation access strategy, the final detailed makeup of the corridor strategy, the separate consultation on the required TROs and other impacts, such as the impacts of any displaced parking on existing highway corridors.

Turning to the access arrangements for the "North of Church Lane" site, the comments made by RBC and LCC to the proposed access arrangements for this scheme are provided below, for ease of reference.

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

ECNF raised the technical matter in their submissions to the Local Plan in August 2019 and again in their January 2023 representations that delivering a new development access in this location onto Blackburn Road would require on-street parking to be permanently removed, and visibility splays would need to cross the adjacent field and stone wall.



The submissions also highlighted the level of existing on-street parking on this section of adopted highway generated by the local school. The point was made at the time that the on-street parking in this location will be made up of teacher and staff parking, along with parent and carer drop-off/pick up at the start and end of the school day, and that the proposed 81% increase in school capacity would be expected to increase on-street parking demand in this location, close to the existing signalised junction.

Whilst the applicant may consider their focus still needs to be on presenting an access strategy and assessment of their element of the wider allocation, to accord with the RBC Local Plan allocation requirements, the scheme needs to be considered as a whole, not in smaller allocations or phases to ensure the cumulative impacts of the 400 unit allocation is appropriately assessed and mitigated. As a consequence we highlight to RBC and LCC that GA drawings should be provided of all the proposed access arrangements to the full site allocation, so an appropriate assessment can be undertaken.

Off-Site Modelling Appraisal

The final technical matter that we would like to raise at this point is the approach to the off-site junction modelling presented in the TA.

As set out in our previous submission RBC and LCC will recall the significant amount of technical modelling work undertaken by all the site promoters on the Market Street corridor, which included detailed assessment of the Rochdale Road/Market Street mini-roundabout junction. Mott MacDonald, RBC's own transport consultants, previously highlighted capacity issues at this junction and commented that because of the geometric alignment of the junction, and third-party landownerships around the junction there is very limited scope for any capacity improvements at this location.

At the time RBC's transport consultants went on to say that due to capacity constraints the overall quantum of residential development in the village may need to be revisited. These capacity constraints were also highlighted in ECNF's technical submissions to the Planning Inspector.

Based on the clear and transparent position set out by all parties above (including ECNF and the applicant's transport consultants) through the Local Plan, the outputs from the off-site junction modelling appear to be completely at odds with both RBC's and LCC's agreed position. Whilst it is not intended to provide all the evidence previously presented by the various parties, it is sensible to remind RBC and LCC that during the EiP the Council's own transport consultants stated in their Highway Capacity Study (section 6.5):

"The Rochdale Rd / Bury Rd junction in Edenfield was noted to be operating over capacity on the Rochdale Rd arm of the junction in the morning and the Bury Rd South arm in the evening, in the 2034 Local Plan scenario. It should be noted, as is stated in Chapter 4, that those results are providing an over exaggerated understanding of the forecast operation of the junction, due the assessment methodology adopted, in particular the distribution and assignment element.

Consideration has been given to the formalisation of the existing uncontrolled crossing on the Bury Rd North arm of the junction into a demand controlled signalised crossing. This has been tested in the ARCADY model and the results are provided in Table 60 overleaf."

Table 60. Junction 11 Rochdale Road / Market Street Edenfield Upgrade Option Results

Lane Description	2034 AM LP			2034 PM LP		
	Q (pcu)	RFC	LoS	Q (pcu)	RFC	LoS
Bury Rd North	9.09	0.92	E	1.63	0.63	А
Rochdale Rd	27	1.04	F	3.72	0.8	с
Bury Rd South	2.63	0.73	с	54.0	1.11	F

"The results in Table 60 demonstrate that provision of a formalised signalised crossing could provide some benefit to the operation of the Bury Rd South arm of the junction, particularly during the evening peak when delay is noted to be at its worst.

It is noted that the Rochdale Rd (morning peak) and Bury Rd South (evening peak) arms are still operating over capacity compared to the Reference case position. This would suggest that further mitigation measures are required in order to deliver the Local Plan up to 2034.

In order to determine the level of Local Plan demand that the junction can accommodate, analysis has been undertaken to adjust the Local Plan traffic volumes, which have found that 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 reported in Table 60 above."

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	

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

* Unadjusted values

"The demands shown in Table 61 above can be accommodated by the junction if the proposed crossing upgrade is implemented. Any further demand beyond those values shown reduces the performance of the junction away from that of the 2034 Reference Case position.

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 (sic) proximity to a number of residential units."

The capacity matter raised by Mott McDonald at this location remains a live issue, and there is very limited scope for any physical improvement works at, and on the approach arms to this junction. As an example Bury Road is subject to significant levels of on-street residential parking, which often reduces the carriageway down to a single lane width. No parking data has been provided for this link, which we consider to be an omission in the technical submission.





Figure 5: Looking North on Bury Road – an Example of Existing On-Street Parking Challenges

The applicant's position Is that since COVID traffic flows on this corridor have reduced, effectively creating "capacity headroom" on the network to allow the full residential site allocation to come forward. The 2023 traffic flows presented by the applicant are not disputed, but there is the obvious concern that if, over time, traffic flows return to pre-pandemic levels the "capacity headroom" will no longer be available, and the development impacts, in traffic and transport terms, would be expected to be in line with the Mott McDonald assessment considered at the EiP.

ECNF have noted that LCC has already rejected the applicant's approach to use the reduced baseline traffic flow data, to carve out capacity headroom on the network. This is confirmed in the submitted TA, which states:

"During pre-application discussions, LCC expressed the view that it does not, at present, solely accept current traffic information as a true reflection of the operational situation of the highway network, due to the effects of Covid and the depressed levels of travel demands."

To this end, it is quite clear that until an agreed position is reached on baseline traffic flows, the need for the assessment to consider the full allocation (including all access arrangements, implications for displaced parking), capacity assessments and the required corridor-based mitigation strategy for Market Street it is not possible for either RBC or LCC to fully assess the impacts of the proposed housing allocation.

In this instance there is perhaps the opportunity to prepare a sensitivity test by applying the predicted development traffic flows for the full allocation on the previously presented traffic flows presented by the applicant during the EiP. That way a "worst case" assessment would be presented to allow a clear appraisal to be considered of the development impact if traffic flows on the local highway network were to return to pre-pandemic levels.



Conclusions

On behalf of ECNF SKTP has always raised concerns with the allocation of 400 additional dwellings in Edenfield village. The point that has been consistently made through the Local Plan process is an allocation of this scale has to be supported by an appropriate level of technical assessment, review and application of due diligence.

Unfortunately the supporting information to the planning application confirms that RBC's requirements for a full, cumulative assessment of the allocation as a whole have still not been fully submitted for consideration. All the technical assessment work produced during the Local Plan process by RBC, ECNF and the site promoters confirmed there would be a material level of degradation to the performance of the local highway network through the village. In terms of traffic impact, the scheme appears to be wholly reliant on the "capacity headroom" created on the network post-pandemic to avoid any material impact on the TA study area. It is certainly an "unknown" as to what level traffic flows on the highway network will eventually return to, but a pragmatic approach would be to test the impacts of the development using pre-pandemic baseline flows.

We have highlighted that the proposed access strategy for the allocation as a whole still has not been clearly set out or appropriately assessed. Examples of this include the lack of detailed assessment of the required one-way traffic flow proposal on Exchange Street, the lack of any detailed designs for the northern and southern land parcels, and a lack of clarity on the delivery of the emergency access route through the Anwyl land, and the effects of displaced parking in these locations.

With regard to the proposed vehicular access strategy from Market Street, the previously identified matters where the proposed access arrangements should widen the eastern footway on this corridor have not been included, or justification for the use of standard "Y" distance visibility splay dimensions. This latest review has also confirmed that the design is not CD123 compliant, and a more detailed assessment of the implications of the loss of kerbside parking on Market Street, in the vicinity of the proposed ghosted right turn junction, is still required. The review of the Market Street access proposals suggest a CD123 compliant scheme cannot be accommodated along the development site frontage. The applicant needs to confirm to RBC and LCC if this is the case, and we would also expect the corridor proposals to be the subject of a Stage 1 RSA.

Finally, ECNF remain of the opinion that all parties are already fully aware of the existing capacity constraints on the Market Street corridor, including the Rochdale Road/Market Street mini-roundabout junction that were discussed in detail at the EiP. This was set out in supporting documents through the Local Plan process. Previous assessment work undertaken by RBC's and ECNF's transport consultants have confirmed existing and future year capacity constraints in this location, which is not borne out by the assessment work in the submitted TA.

The TA presents an approach where baseline traffic flows are reduced to carve out "capacity headroom", as well as a lack of clarity on the final traffic distribution in the peak periods. The findings from the 2023 traffic surveys are not disputed, but as highlighted by LCC and recorded by the applicant in the TA whether current traffic flows reflect the long term operational situation of the highway network remains an unknown.

To this end, it is quite clear that until an agreed position is reached on baseline traffic flows, the need for the assessment to consider the full allocation (including all access arrangements, implications for displaced parking), capacity assessments and the required corridor-based mitigation strategy for Market Street it is not possible for either RBC or LCC to fully assess the impacts of the proposed housing allocation.

As set out in our January 2023 response we look forward to LCC and RBC's response on the technical matters highlighted in this letter. In the meantime if you require any further information ECNF will be pleased to assist you on any technical matter.



Yours sincerely,

Director

smarter transport solutions. 16/16

Additional objection by Ian and Barbara Lord to the Masterplan & Design Code for Edenfield allocation H66

The following comments are in addition to those we submitted on 17th January 2023 and relate to the revised Masterplan and Design Code (MDC) which was published in June. Our comments on the Highways Consideration of Masterplan (HCM) and the Market Street Corridor Improvement Plan (MSCP) which were also published are included in our comments on planning application 2022/0451.

Overview

The MDC still does not give the impression of having substantial input from developers other than Taylor Wimpey. It also continues to give the impression of being written with minimal knowledge of Edenfield and the views of its residents.

Stakeholder engagement & Design Code

It is essential that **all** feedback of the Places Matter Design Review Panel is taken into account. Details of how the feedback has been incorporated in the Design Code should be publicised and, more importantly, details of any feedback not incorporated and the reasons why not.

Only limited weight has been given to the draft ECNF Design Code. In the earlier version of the Masterplan (November 2022) it was stated: *We note that the Edenfield Neighbourhood Community Forum (ECNF) have prepared their own Draft Design Code for the wider village (produced by AECOM), which is intended to be published alongside the emerging Neighbourhood Plan. We were made aware of this document through engagement with the ECNF during early 2019; however, the document was only formally shared with us in late June 2022, and as such have had limited time to treview and integrate it with our own work. Limited time is no longer an excuse as the current MDC is dated twelve months after June 2022.*

The current MDC states: This Masterplan and Design Code also takes account of the AECOM Design Code Report within the emerging Neighbourhood Plan, albeit this has only been given limited weight, due to its early stage of production (with the initial Regulation 14 consultation undertaken in March and April 2023, some time after this document was submitted) and the fact that it largely ignores the development of the H66 site and is primarily focused on the existing vernacular and characteristics of the village. This is the latest excuse to avoid taking into account the views of residents. The changes in the Neighbourhood Plan from June 2022 to March 2023 are not considered to be fundamental.

Phasing

The phasing proposals in the current MDC are virtually unchanged from those in the previous version. This is an extremely important issue and so we repeat the comments we made in our 17th January submission:

Phasing must be an important part of the masterplan particularly when a development of 400 houses (plus allocations for another 56 houses) will increase the size of the village of which it is part of by nearly 50%. The impact on local infrastructure and services is enormous

so it is crucial that the timing for both H66 overall and each site separately is planned in detail to ensure that they are not overwhelmed.

The table on page 71 indicates that the TW site will be developed first and the AL site second with the other two sites following. However, the owners of these sites have not had any input to the submission, may disagree and may choose to bring their sites forward for development earlier. The phasing of H66 and also each site within it must be agreed before any planning applications can be considered. If this is not done the village could experience chaos for anything up to fifteen years whilst H66 is developed.

Have the developers of the Anwyl and Peel sites now agreed to this phasing which shows them following the Taylor Wimpey development (and so potentially delaying their developments for many years)? We understand that Peel are keen to develop their site in the near future which would indicate not.

The one page given over to phasing in the MDC is totally inadequate. For the reasons given in our previous comments (repeated above) a detailed plan is required showing for each site the timing of housing starts and completions.

Ian and Barbara Lord



11th August 2023

As a resident of Market Street, and a long-term resident of Edenfield, I would like to submit my objection to the planned housing development Land West of Market St. Edenfield (H66).

The plans have taken no account of the affect on health, safety, traffic and pollution or parking for residents of Market Street. I will address these points in order:

Health: I am 56 years old and live with multiple long-term conditions, which are acknowledged as a national and global health priority by the Academy of Medical Sciences and the World Health Organisation. My ability to live independently will become more constrained as I age further. Taking away my parking, and creating a traffic situation which is not consonant with my future mobility issues, is a violation of my human rights and an assault against a protected characteristic (age).

Further, I am not the only local resident who will be affected; there are many older people in my terrace, and living in the vicinity, who are likely to develop mobility issues in coming years and who will need to be able to easily access personal vehicles.

Safety: The planned changes to Market Street represent clear and present danger, not only to the older residents, but also to those with young families. With the proximity of Edenfield primary school, as well as families residing on Market Street, children, along with vulnerable road users such as cyclists, will be put at risk by the planned developments. I am aware that a road safety audit has been recognised as a necessary part of considerations, yet no action has been taken to provide this. The proposed junctions are unsafe, with poor visibility and limited safe crossing.

Traffic and pollution: Market Street can already suffer heavy traffic, and is a key route for large agricultural vehicles. The 'choke' points at both ends of the street can be difficult to progress through now, even during non rush-hour periods. The planned housing development, combined with other local housing developments in Edenfield and Shuttleworth, would bring approximately 1000 more cars through the village per day. It is simply not feasible for Market Street to absorb this additional level of traffic. Additionally, the additional level of traffic would create intolerable levels of pollution, known to exacerbate risk of respiratory mortality (Doiron et al., 2019).

Parking: The proposed parking solution for Market Street is not fit for purpose. I have lived on Market Street for three years, and on a typical day there are around 35 cars parked on areas of the road which would be marked with double yellow lines. The proposed parking solution offers just 13 places. Where do the developers imagine Market Street residents will park? How will we progress home improvements, when tradespeople will be unable to park in front of our properties? How will we take shopping into our homes, especially those of us who face reduced functioning as we age? How will parents get their young children safely home?

The above points, in addition to concerns about further release of greenbelt land, heightened flood risk, and impact on local businesses must be taken into consideration. The proposed developments infringe my (and other residents') human rights.

Best wishes,

Dr Sue Bellass,

We are writing to object to the above application and confirm our support for the ECNF objection.

Our reasons for the objection are as stated in our previous objection to the original plan, which will, no doubt, be held in your files.

Charles White and Helen White of

Forward Planning Policy Comment

Edenfield Masterplan and Design Code

This response relates to the revised Masterplan and Design Code (submitted June 2023). It is not intended to refer specifically to Taylor Wimpey's related planning application.

To summarise we note that the applicant has provided a much clearer document with helpful maps and diagrams, although we consider that there is still much detail outstanding. In particular we would have expected measures to address Green Belt compensation and biodiversity net gain to have been shown, whether on or off site.

As with the earlier response, the revised proposed Masterplan and Design Code is assessed below against policies and guidance in the National Planning Policy Framework, the Design: process and tools Planning Practice Guidance, the National Design Guide and National Model Design Code, as well as the Local Plan policies and the draft Edenfield Community Neighbourhood Plan Design Code.

In order to provide a structure to the comments, the requirements of the site specific policy H66 in the Rossendale Local Plan for the Land West of Market Street in Edenfield will be used.

1. The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing;

We welcome the changes to the boundary of the masterplan to exclude land north west of Church Crescent.

The additional detail for land owned by Peel Land and Property has also been provided, including their proposals for the land to the east of Market Street. However, it should be noted that we would expect the Masterplan and Design Code to provide guidance for the entire allocation and any related land (e.g. possible school extension, land owned by Richard Nuttall, and the land around Alderwood). We would suggest that these owners are invited to participate in the production of this document and would have the opportunity to make their views known through the consultation process.

We do note that the Masterplan and Design Code repeatedly refers to further details being provided in subsequent planning applications. Again, it is necessary to stress that we expect the Masterplan and Design Code to establish the overall framework for the development of this allocation.

There does not appear to be an agreed programme of implementation and phasing – with specified time periods - to support the delivery of the allocation. Although the table and map are useful (pp54-55), they lack this specific detail.

2. The development is implemented in accordance with an agreed design code;

We welcome that the design code proposed for the site allocation H66 is now assessed against all ten characteristics of the National Design Guide and National Model Design Code. These 10 characteristics are listed below:

- Context
- Identity
- Built form
- Movement
- Nature
- Public spaces
- Uses mixed and integrated
- Homes and buildings functional, healthy, sustainable
- Resources efficient and resilient
- Lifespan made to last

<u>Context</u>

The Masterplan and Design Code provides a good level of information to set out the context of the site, and has expanded on the previous version to provide a much clearer presented and informative section, with maps, diagrams and photographs.

As reported in the revised Masterplan, Edenfield Community Neighbourhood Forum (ECNF) has prepared and undertaken a Regulation 14 consultation for the emerging Neighbourhood Plan, and this includes a draft Design Code for Edenfield Neighbourhood Area, prepared by their consultants Aecom, which is published on their website. We maintain that this provides some useful information in relation to the context of the site and to the other 9 characteristics of a design code. Although the updated Masterplan and Design Code now refers to this, it suggests the Design Code should only have limited weight. However, it should be remembered that ECNF's work benefits from participation by the local community in its preparation. Ideally it would be beneficial if the developers' masterplan could be assessed against the work published by ECNF, and the comments that were received during the consultation.

We note that information relating to green and blue infrastructure including ecological networks and waterways has been added.

A further landowner has submitted recently a planning application (2022/0577) in the vicinity of Alderwood, which is within the site allocation boundary. This area should be identified in the Masterplan as land with the potential for development.

Identity/Character areas:

The Masterplan and Design Code identifies three character areas for the existing Edenfield settlement: north Edenfield, Market Street and South Edenfield. The identification of these character areas is slightly different from the ones proposed in

the draft Design Code of the Neighbourhood Plan where four character areas for the Neighbourhood Area have been identified. These are: the village cores, the traditional terraces, the piecemeal domestic development mainly in south Edenfield and the rural fringe. This is shown on the diagram below:



Figure 1- Proposed character areas by Randall Thorp for Taylor Wimpey (left) and draft character areas identified by AECOM for ECNF (right)

The Masterplan explains the differences between these in much more detail, justifying these Character Areas.

Built form

Layout

We note the internal road layout in the southern parcel near Chatterton Heys has a south-west to north-east axis which may help protect views to Peel Tower as set out in the Landscape Assessment Study and the allocated site specific assessment¹. This key view needs to be highlighted in the key characteristics for this area.

¹ Lives and Landscapes Assessment – Volume 2: Site Assessments (2017) https://www.rossendale.gov.uk/downloads/file/14131/volume_2_site_assessments_-_version_2 -_partially_updated_july_2017

Building Heights:

The ECNF Design Code states that the height of new properties situated within Area A of the landscape assessment study (the central parcel of the site) where landscape impacts have been assessed as being significant, should be no more than 2 storeys to mitigate adverse impacts. We note the additional detail of building heights in the revised document and would only seek to stress that we would expect to see landmark buildings which don't obscure direct views of the surrounding countryside.

Boundary treatments:

The use of dry stone walls and hedges should be used in the character areas along Market Street and Blackburn Road in keeping with the village cores and traditional terrace character areas of the Edenfield Neighbourhood Area Design Code.

• Setbacks:

Acceptable distances between properties and the road should be provided. The setback should be small for properties along Blackburn Road and Market Street to be in keeping with the local character of the village cores and traditional terraces. The setback should be more important in the central and rural edges of the development to include large front gardens.

<u>Movement</u>

• Street typologies

We note the indicative hierarchy of streets such as secondary and tertiary and the presence of on-site trees.

• Active travel and public transport

In terms of pedestrian and cycle provision, a north to south walking and cycling route through the site will provide a safe, off-road connection through Edenfield, linking into the wider walking and cycling network branching to Rawtenstall, Haslingden & Irwell Vale.

We would like to see greater reference to the improvements to the footpath and bridleway networks as discussed in the Green Belt Compensation Paper and with regard to Taylor Wimpey's current planning application, as we highlighted previously.

The creation or enhancement of existing footpaths and cycle ways to Edenfield Primary School and to the Edenfield Neighbourhood Parade (as shown on Policies Map) and south to Stubbins and north to Rawtenstall are important to ensure good accessibility to local services from the development site. Improved routes between Edenfield and Stubbins would also be appropriate, as this would link the southern part of the allocation with Stubbins and the facilities there, including the Primary School. These should be appropriately lit, direct and overlooked by properties as much as possible.

<u>Parking</u>

Car parking should include the provision of electric vehicle charging points in line with the Local Plan policy TR4, with one electric vehicle charging point to be provided for every new house'.

Three community car parking areas are now included in the Masterplan. All of these must also comply with Policy TR4, providing the appropriate amount of electric vehicle charging points for the number of spaces provided.

A discrepancy also exists between the "Market Street Corridor Improvement Plan" and the most recent site layout for Planning Application 2022/0451, specifically regarding the community car parking area along the main vehicular entrance into the central parcel of allocation H66. The Market St Corridor Improvement Plan shows a one-way system flowing West to East, whereas the site plan for application 2022/0451 shows a one-way system flowing the opposite direction from East to West. Clarification is sought on this discrepancy, with the preferred option being the one shown in the Market St Corridor Improvement Plan. However, it is considered important to note that the position of the car parking facility requires a right turn across an oncoming traffic flow, giving rise to potential tail backs onto Market St. Further information regarding this may be provided by Lancashire County Council.

Waste collection

The Masterplan and Design Code does not set out how bin storage and collection is to be provided throughout the site. Guidance is available from the NHBC².

<u>Nature</u>

• Green Infrastructure

We note this section has been expanded, however, there is still no reference to any on-site water courses. We note that the proposed scheme still contains two ponds, which originally was not supported by the LLFA.

Biodiversity

The woodland along Church Lane is shown as a Deciduous Woodland – Priority Habitat on the Magic Map website. As such, any proposals to destroy part of this woodland as shown to the north of Church Lane to accommodate housing will not be supported. It is however considered that the provision of a cycle way / pedestrian link from the central parcel of the allocated site to the northern parcel, via this woodland, could be acceptable providing that the minimum number of trees are felled and each tree is replaced to the ratio of 1 tree felled to 2 trees replanted.

² <u>https://www.nhbcfoundation.org/wp-content/uploads/2016/05/NF60-Avoiding-rubbish-design.pdf</u>

It appears that the area of woodland between the central and northern parcels has been reduced. Can this be clarified?

The masterplan does not indicate where or how within the allocation will the measures to address biodiversity net gain be positioned. This would seem to be an unfortunate omission.

<u>Uses</u>

The Masterplan should set out that 30% of the dwellings should be affordable in accordance with Policy HS3 of the Local Plan, <u>and the tenure of these units</u>.

Also at least 10% of the plots in the new development should be made available for custom or self-build for people wishing to build their own homes. Since our original responses, the number of people on the Rossendale Self-Build Register has increased to 47 (as of 10th August 2023). Amongst these, three people identified Edenfield as their first choice of settlement, seven as their second choice and 5 as their third choice. 1 other person identified Edenfield as one of their choices. As such a total of 16 people identified Edenfield as one of their preferred location to initiate a self-build project.

Homes & buildings

The Masterplan and Design Code should set out that at least 20% of the dwellings should be built according to the standard M4(2) of the Building Regulations in order to be compliant with Policy HS5 of the Local Plan. We note that Taylor Wimpey's planning application exceeds this.

Resources

The Masterplan should consider the orientation of properties to maximise the use of solar technologies whilst preserving key views to Peel Tower in the southern section and to the western tower of Edenfield Parish Church in the central part of the site. We note the insertion of R01 and R02 but consider these should be strengthened, and the schemes to go beyond the minimum Building Regulations standards.

It is expected that 10% of energy requirements from the new development will be met by on-site renewable energy provision such as through the use of solar panels and/or air source heat pump as set out on the Climate Change Supplementary Planning Document³. A full assessment will be required to accompany any planning applications to show how this proposal accords with the Climate Change SPD. It is

³ <u>https://www.rossendale.gov.uk/downloads/file/17881/climate_change_spd</u>

^{*}a habitable room is defined as a room in which a resident would normally expect to have reasonable levels of privacy for relaxation. This normally would be a living room, dining room, bedroom or kitchen. Studies, work rooms, utility rooms or bathrooms are not normally defined as habitable rooms.

the Council's hope that the development of this former Greenbelt land would be an exemplar scheme, not just for Rossendale but wider afield.

<u>Lifespan</u>

We note that this has now been addressed.

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.....:

We note that a full transport assessment is expected.

If the Community Car Parking Areas are proposed for existing residents of Edenfield who may have vehicles displaced due to proposed on-street parking restrictions on Market St, we would expect to see details on how these new parking spaces will be retained and secured for these existing residents.

- 4. A Heritage Statement and Impact Assessment is provided and suitable mitigation measures are identified and secured to conserve, and where possible, enhance the setting of the Church, the non-designated heritage assets which include Chatterton Hey (Heaton House), Mushroom House, and the former Vicarage, and the other designated and non-designated heritage assets in the area;
 - *i.* Landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development and provide a buffer to the new Green Belt boundary
 - ii. Materials and boundary treatments should reflect the local context

We maintain that the use of natural stone and not just reconstituted stone or stone effect should feature within the material pallet in the design code especially for properties fronting Market Street and Blackburn Road.

Timber wall boundary treatments will not be acceptable alongside the principal elevation of dwellings. The use of boundaries which will enhance biodiversity should be encouraged, for example, permeable for wildlife to minimise the impact of the development on small mammals.

5. An Ecological Impact Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts particularly on the Woodland Network and stepping stone habitat located within the site.

The woodland area to the south and north of Church Lane should be retained and strengthened.

6. Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4

As cited previously the Masterplan should identify the locations of proposed Green Belt compensation measures and set out further information about the nature of these measures and a timescale for their implementation.

A schedule should be prepared for the whole allocation showing which measures are being provided, and by which developer(s) for green belt compensation where appropriate, and for biodiversity net gain. Specific measures which are required to mitigate impacts of the development should also be distinguished.

7. Geotechnical investigations will be required to confirm land stability and protection of the A56, and consideration paid to the suitability or not of sustainable drainage systems on the boundary adjoining the A56

As noted previously the Masterplan and Design Code are not accompanied by geotechnical investigations to confirm the suitability of sustainable drainage systems along the A56. This should be addressed.

8. Provision will be required to expand either Edenfield CE Primary School or Stubbins Primary School from a 1 form entry to a 1.5 form entry primary school, and for a secondary school contribution subject to the Education Authority. Land to the rear of Edenfield CE Primary School which may be suitable is shown on the Policies Map as 'Potential School and Playing Field Extension'. Any proposals to extend the schools into the Green Belt would need to be justified under very special circumstances and the provisions of paragraph 144 of the NPPF

It is our understanding that Edenfield is the preferred school for expansion by the Education Authority. Comments have been received from the Education Authority and further work is being requested from them to look specifically at the impacts on school provision in Edenfield from the entire H66 allocation. The masterplan needs to indicate how and when on-site expansion at Edenfield or Stubbins would be considered and delivered by the developers.

It should be noted that the developers will still need to apply for planning permission and justify special circumstances as to why this land which is within the Green Belt should be developed.

9. Noise and air quality impacts will need to be investigated and necessary mitigation measures secured

We note that the acoustic barrier has been removed from the masterplan, without any explanation for this.

10. Consideration should be given to any potential future road widening on the amenity of any dwellings facing the A56.

In addition to the noise buffer between the A56 and the proposed development, there should also be a buffer to consider potential future A56 widening on the amenity of the proposed dwellings alongside the A56 (such as gardens).

Additional Relevant Policy Considerations

Strategic Policy SD2: Urban Boundary and Green Belt of the Local Plan (adopted 2021) includes H66 and notes "The Council will expect that the design of development on the above sites minimises the impact on the character of the area and addresses relevant criteria in policy ENV3. Development will also be expected to contribute to compensatory improvements to land elsewhere in the Green Belt, enhancing both its quality and public access."

The explanation to Policy SD2 notes in paragraph 50: "At Edenfield the justification for Green Belt release particularly relates to the strong defensible boundary of the A56 and the opportunity to masterplan the site to produce a high quality planned housing development that minimises impact on openness. There is strong market demand in the area".

Para 120 of the Site Specific Policy for H66 refers to "this land lying between the A56 and Market Street in Edenfield from the Green Belt. The area is very open in character and allows views of the surrounding hills and moors and will require a well-designed scheme that responds to the site's context, makes the most of the environmental, heritage and leisure assets, and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements"

Para 121 is clear that "Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Neighbourhood Forum, to ensure a Masterplan is prepared".

Para 125 states "Any proposed development must make a positive contribution to the local environment and consider the site's form and character, reflecting the setting of features such as the Grade II* Listed Edenfield Parish Church and incorporating appropriate mitigation. Development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance. The development must contribute towards the sustainable use of resources. Implementation of development must be in accordance with an agreed Design Code/Masterplan across the whole development. The layout should be designed to allow glimpsed views towards the Church to continue, for example, by

aligning the principle road(s) along a north-south or north east – south west axis, and building heights restricted".

The importance of a phasing and implementation plan is noted in Para 126. "In light of the site's natural features and relationship to surrounding uses, development is likely to come forward in a number of distinct phases. The infrastructure associated with the overall development and each individual phase will be subject to the production of a phasing and infrastructure delivery schedule to be contained in the Masterplan. Site access will be a key consideration".

In view of the scale of this allocation, its location in former Green Belt land, and its strategic importance to the Borough, a site specific policy has been prepared. However, other Local Plan policies are relevant too and in particular attention is drawn to Policy ENV3 on Landscape Character and Quality. In particular ENV3 notes:

In order to protect and enhance the character and quality of the landscape, development proposals should, where appropriate:

• Respond positively to the visual inter-relationship between the settlements and the surrounding hillsides and follow the contours of the site;

• Not have an unacceptable impact on skylines and roofscapes;

• Be built to a density which respects the character of the surrounding area with only low density development likely to be acceptable in areas abutting the Enclosed Upland or Moorland Fringe Landscape Character Areas;

• Retain existing watercourses, trees and green infrastructure features that make a positive contribution to the character of the area;

• Incorporate native screen planting as a buffer to soften the edge of the building line in valley side locations;

• Take into account views into and from the site and surrounding area, retaining and, where possible, enhancing key views; and

• Retain and restore dry stone walls, vaccary stone flag walls and other boundary treatments which are particularly characteristic of Rossendale.

 Development proposals should incorporate a high quality of landscape design, implementation and management as an integral part of the new development. Landscaping schemes should provide an appropriate landscape setting for the development and respect the character and distinctiveness of the local landscape.

