

## **/1 INTRODUCTION**

- 1.1. PWA Planning have been instructed by E3P on behalf of James Industrial Land (the landowner) to make formal representations on Rossendale's Local Plan (2019 to 2034) in relation to the Inspector's Matters, Issues and Questions.
- 1.2. Formal representations were made by Cass Associates on behalf of the landowner in December 2018 on Rossendale's Local Plan (2019 to 2034).
- 1.3. These representations respond to the Inspector's Matters, Issues and Questions to Rossendale's Local Plan (2019 to 2034) in relation to the soundness of the Plan and should be read in conjunction with those previous representations.

## **/2**     **MATTER 14: HOUSING SITE ALLOCATIONS – EDENFIELD, IRWELL VALE AND EWOOD BRIDGE**

Issue – Are the proposed housing allocations in Edenfield, Helmshore, Irwell Vale and Ewood Bridge justified, effective, developable/deliverable and in line with national policy?

2.1     These Representations are made only in relation to H70 – Irwell Vale Mill, Irwell Vale, hereafter called 'the site'. The site is considered suitable for housing despite the site having a number of constraints. These are discussed in turn below and it is demonstrated that the site can be developed despite these constraints.

a) Is the site suitable for housing? Are there any specific constraints or requirements associated with the site, or a need to seek mitigation measures to achieve an acceptable form of development? Should these be specified in the Plan?

2.2     **Brownfield Site:** The site is largely a brownfield site having housed the former Irwell Vale Mills. A woollen mill was built to the south of the River Ogden in 1800 and later a cotton mill built adjacent. There were extensions to the Mills in the 1930s and 1950s. The Mills themselves were demolished but the extensions remain although are no longer in use. The last use of the mill extensions was as a soap factory. The site has been vacant since 2015 and has not attracted any interest or offers whilst marketed since this time. The marketing agent believes the reason for this was mainly due to the access arrangements over a weight limited bridge for larger vehicles. The redevelopment of the site will remove the large heavy vehicles associated with the former factory use. Paragraph 117 of the Framework urges strategic policies to set a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or brownfield land. The land to the north of the river contains a long building associated with the mill and to the north of that is undeveloped countryside.

2.3     The site has been subject to a previous planning application for housing (reference 2017/0290) which was withdrawn. This application was accompanied by a land contamination report which gave a recount of historical uses and potential pollutants.

Paragraph 118 c) of the Framework considers opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Allocating this site for housing will see the removal of a derelict building and contaminants. These will both have social and environmental benefits. There are also other social and environmental benefits which are expanded on below.

- 2.4 **Flood Risk:** The Council's Green Belt Study states *"the Environment Agency support the development of the site as demolition of the Mill would create the opportunity to reconfigure the River Ogden at this point and reduce overall Flood Risk in Irwell Vale."*
- 2.5 The Environment Agency made comments on a previous planning application which was withdrawn (reference 2017/0290) stating *"With regard to the Irwell Mill site taken as a whole, there would appear to be potential for the redevelopment to reduce flood risk associated with the River Ogden. The existing site configuration with the mill buildings forming the channel results in a constrained watercourse. If the site were redeveloped as a whole there is potential to create a less constrained channel. This could provide a reduction in flood levels although the existing Ogden Bridge may limit any benefits. Only reassessment by modelling would ultimately determine this. We would recommend the developer and the LPA consider the overall site development and how this could potentially reduce flood risk to the development site and surrounding properties."*
- 2.6 Largely the site lies in flood zone 3a, modelling shows the site floods primarily due to water overtopping the banks of the River Ogden and flowing across the site. Weetwood have been commissioned to amend the hydraulic model of the River Irwell and River Ogden to improve the representation of flood risk at the site. Weetwood modelled different options to simulate flooding with different mitigation proposals to reduce flooding on the site and adjacent areas.
- 2.7 Weetwood have created four modelling options to mitigate flood risk at the site. A couple of the mitigation scenarios resulted in a significant portion of the site remaining dry and therefore being able to be developed. The proposed mitigation included

removing the existing mill culvert; creation of a flood wall along the southern bank of the River Ogden within the site; and creation of a flood storage area.

2.8 Proposed mitigation measures will reduce flood risk on the site to allow for some development. Furthermore, the flood risk off-site will decrease the level of flooding to some properties off Milne Street (by up to approx. 200mm during the 1:100 AEP plus 30% climate change allowance flood event) resulting in a betterment and a consideration in favour of the site being developed. The flood risk along Main Road will be largely improved, by removing approx. 50 m length of road from risk of flooding and reducing flood depths by up to 1.2 m on the next section. However, the flood depths on the section of Main Road next to the bridge will be increased (by up to approx. 110 mm during the 1:100 AEP plus 30% climate change allowance) but this is not material as Main Road already experiences flooding to depths of approx. 800mm-1.0m in this area. Weetwood have carried out modelling to reduce flood risk off site and a meeting is scheduled to take place with the Environment Agency in September 2019 to discuss these models. We understand that the Inspector may wish to have an update at the Examination as to the outcome of this meeting and if so, we wish to indicate at this stage our acceptance. It is our intention to be accompanied by a representative from Weetwood at the Examination when Matter 14 is discussed.

2.9 The outline planning application for the site, that is currently being finalised, will apply for layout. The layout will not propose any development in those areas that remain in flood zone 3. The flood mitigation works will also reduce flooding depths to some residential properties in adjacent areas.

2.10 **Heritage:** The site lies partly within (southern section) and also adjacent to the Irwell Vale Conservation Area. Aside of the remaining Mill extensions nearly all the buildings in the conservation area are residential. The predominant building type are very simple two-storey terraced cottages dating from 1833 (now Grade II Listed) built with the original Mills. Materials are almost exclusively sandstone; some houses have been rendered and some of these painted. It is considered that the site can be developed having a positive effect on the Conservation Area by removing some of the later

additions to the area from when the Mills were extended, including those within the conservation area. The development of the site can be designed to be entirely appropriate to the conservation area and policy ENV2 ensures such requiring consideration to the significance of the historic environment. The development of the site does however require the demolition of the extensions to the former Mill buildings dating from the 1930s and 1950s to be able to bring forward the flood mitigation (removal of the culvert). It is envisaged that this is appropriate as they were later additions to the original Mills and the Conservation Area Appraisal in 2011 listed the soap factory as an issue facing the Conservation Area that needed addressing.

b) Is the proposed site capacity appropriate, taking account of constraints and the provision of necessary infrastructure?

2.11 The site capacity in the allocation is 45 units. At this stage, until all of the modelling information has been agreed with the Environment Agency, we are unable to agree to this as a minimum number but do accept it is a reasonable assertion for a maximum number having regard to the constraints of the site.

c) Is the site available and deliverable in the timescales envisaged?

2.12 The landowner has supplied a letter of commitment (detailed at Appendix 1) that outlines they will undertake the site remediation and enabling earthworks on the site to ensure that the site is prepared for the new residential development in a manner that removes long term residual risk, ensures significant environmental improvement and alleviates flood risk in the village. The letter states that the landowner may prepare the site to present an oven ready site for a developer or they may in fact fully develop it themselves which they have experience of doing. If the latter were the case it is expected the site would achieve an average build-out rate of 20 dwellings per annum.

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

2.13 **Green Belt Release:** Green Belt sites have been allocated for housing in the draft Local Plan to provide for the housing requirement in the district. The site currently lies in the Green Belt and the Council are proposing to release it. The Council has conducted a Green Belt release in which this site was assessed. The Rossendale Green Belt Review November 2016 concluded:

*"This parcel does not perform strongly against any of the Green Belt purposes. Although not considered a strong defensible barrier, the line of trees along the eastern boundary of the parcel plays important role in separating it from the larger area of open Green Belt to the east (P27). It is considered that the removal of parcel P33 from the Green Belt is not likely to have a substantial negative effect on neighbouring parcels or the integrity of the wider Green Belt."*

2.14 It is considered that as the site did not perform well in the Green Belt Review that it is suitable for release from such. No exceptional circumstances were required for this site. The importance of the tree belt to the eastern boundary was acknowledged in the findings of the Green Belt Review. The indicative site plan that was submitted with the pre-application request (detailed at Appendix 2) and the subsequent planning application, that will follow, recognises this tree belt and seeks to retain it. This will also ensure the rural character of the area is maintained. Whilst there are natural features of this site there is considered adequate provision within strategic policy SD2 to retain them which states *"the design of the development (on the above sites) minimises the impact on 'openness'.*

## APPENDIX 1

**21 August 2019**

*As the landowner, JIL may well undertake to develop the site of the former Irwell Mill for a new low rise residential end use ourselves, or with a development partner. In the past jointly we have delivered similar sites including the residential led scheme at the former Airtours building in Helmshore with Malloy Hale.*

*JIL will undertake the site remediation and enabling earthworks working in partnership with our preferred engineers and sub-contractors. This approach ensures that the site is prepared for the new residential development in a manner that removes long term residual risk, ensures significant environmental improvement and alleviates flood risk in the village. Critically the completion of the demolition, remediation and enabling earthworks will ensure that the site is delivered ready for construction of the new homes.*

*Historically in partnership JIL delivered many sites in this 'oven ready' manner, some of which are as big as the 700 unit scheme at Prescott Park in Knowsley.*



## APPENDIX 2



**KEY**

- |   |                                  |   |  |
|---|----------------------------------|---|--|
|  | Site boundary                    |  | Proposed developable areas               |
|  | Existing trees to be retained    |  | Proposed built form & primary elevations |
|  | Existing woodland to be retained |  | Proposed nodal squares                   |
|  | Existing watercourse             |  | Proposed pedestrian / cycle links        |
|  | Proposed access points           |  | Proposed green Infrastructure            |
|  | Proposed road                    |  | Flood attenuation zone                   |

# ILLUSTRATIVE STRUCTURE PLAN

## UG241 IRWELL VALE MILL, ROSSENDALE

CLIENT: E3P      DRAWN: ME    CHECKED: MT    APPROVED: MK  
 SCALE@A1: 1:500      DATE: 27/08/19      DRAWING NO: UG\_241\_LAN\_DRW\_01

