

Rossendale Local Plan Examination in Public

Matter 14 (Housing Site Allocations)

Hearing Statement on behalf of Anwyl Land

August 2019

Relevant Site:

Land at Exchange Street, Edenfield (Part of Housing Allocation H72 – Land West of Market Street, Edenfield)

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1 Introduction

- 1.1 This statement has been prepared on behalf of Anwyl Land and responds to the Issues and Questions raised by the Inspectors in July 2019.
- 1.2 For clarity, this Statement relates to the continued promotion of land at Exchange Street, which forms the southernmost part of the wider proposed Housing Allocation H72 (Land west of Market Street, Edenfield). Up until this point, previous Local Plan representations relating to this site have been submitted by the landowner The Methodist Church. Anwyl Land now have an agreement in place with the Methodist Church and so will be promoting the land at Exchange Street, Edenfield through the remainder of the Examination process with an intention to develop housing at the site.
- 1.3 The parcel of land being promoted by Anwyl Land is accessed via Exchange Street and is capable of accommodating around 90-100 homes. Land to the immediate north forms part of the same allocation and Anwyl Land (as the Methodist Church did before) have engaged with Taylor Wimpey and Peel who are the other landowners in order that the whole allocation is delivered in a co-ordinated manner.
- 1.4 Anwyl Land (represented by Hive Land & Planning) intend to participate in the Matter 14 Hearing session being held on Tuesday 8th October 2019 and trust that this Statement assists the Inspectors in respect of the Examination.

2 Matter 14 – Housing Site Allocations: Edenfield, Helmshore, Irwell Vale and Ewood Bridge

2.1 This section provides Anwyl Land’s response to the following Issue raised under Matter 14:

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

2.2 Each of the Inspectors questions are now addressed accordingly in relation to proposed housing allocation H72 ‘Land west of Market Street, Edenfield.’

2.3 Where questions are related to site specific impacts, we provide our response as it relates to the land specifically in Anwyl Land’s control at Exchange Street and allocation H72 as a whole only where appropriate to do so. The Hearing Statements being submitted by Taylor Wimpey and Peel (the other two landowners promoting land within housing allocation H72) will address any site specific impacts and necessary mitigation arising from their respective parcels of land and should be referred to in conjunction with this statement.

a) What effect would the proposed housing allocation H72 have on local landscape character and appearance, and the setting of the village? Could impacts be mitigated?

2.4 Document EB025 ‘Lives and Landscapes Assessment’ provides the relevant evidence in relation to local landscape character. Volume 2 of the study (partially updated in July 2017) considers the contribution that individual sites currently make towards overall landscape character and the potential impacts arising through the introduction of built development.

2.5 The land comprising Housing Allocation H72 is identified as being within the 8b Irwell Valley South Settled Valley Landscape Character Area and considers the site in four separate Areas. Land off Exchange Street is identified as ‘Land east of motorway Area D’. The Assessment recognises that Area D is less visible as a result of the existing vegetation and its close association with the existing built development in Edenfield, concluding that the site could be ‘developed sensitively and incorporated successfully into the village boundary’ and as such is suitable for development with mitigation. The site was one of the few sites in the village to be assessed as being ‘developable with mitigation’.

2.6 The evidence base therefore confirms that it is entirely appropriate to identify the land at Exchange Street as part of the proposed Housing Allocation H72 and the key mitigation measures that have been identified such as the retention of existing trees around the site and the integration of and interaction with areas of public open space have been incorporated into the masterplanning approach that has been taken.

b) Is the scale of the proposal consistent with the development hierarchy and the sustainability of its village location? What proportional growth does it represent for Edenfield? What effect would the scheme have on the function, form and identity of the village?

Justifying the level of proportional growth

2.7 The following evidence base documents provide the primary components of the justification to include Land West of Market Street, Edenfield as a Housing Allocation in the Local Plan:

- EB001 'Strategy Topic Paper 2018'
- EB006 'Housing Topic Paper 2019'
- EB019 'Rossendale Local Plan Economic Viability Assessment 2019'
- EB020 'Update Economic Viability Study in relation to Affordable Housing 2017'

2.8 It is acknowledged that on a purely proportionate basis based upon settlement population, Edenfield as a Local Service centre is allocated a greater proportion of housing than some of the locations higher up in settlement hierarchy. However, the Strategy Topic Paper confirms that Edenfield and the land west of Market Street is in a strategic location and that it can help address matters of borough-wide significance. The critical considerations in this case are ensuring that the housing strategy identifies sufficient housing allocations that are deliverable, developable and viable and delivering the required level affordable housing.

2.9 The 2017 Viability Study assesses the viability of affordable housing delivery on a number of potential development sites across the Borough. Edenfield is located within Zone 4, which also includes Helmshore and the more affluent parts of Rawtenstall and Haslingden. From a viability perspective, historically these areas have achieved much higher sales values than other parts of the Borough. As a result this has helped to ensure that the delivery of individual sites remains viable and the delivery of or contribution towards key infrastructure through off site contributions and the delivery of on site

affordable housing can be justified. Alongside this, the delivery of market housing in Edenfield is responding to a known market demand.

- 2.10 The Viability Study confirms that other areas of the Borough in Zone 1 (Bacup, Stacksteads) and Zone 2 (Whitworth, Waterfoot, East Rawtenstall, amongst other locations) experience viability issues and so the delivery of affordable housing in particular suffers as a result. Exceptional circumstances therefore exist, underpinned by robust viability evidence, that justify a larger proportion of housing being directed towards Edenfield in order that the housing strategy can be considered realistic and justified.
- 2.11 This is a critical issue because historically, there has been persistent under delivery of housing in Rossendale and so an alternative strategy needs to be adopted in order to help reverse this historic trend. The latest Housing Land Supply Report (published March 2019) confirms that Rossendale can only currently demonstrate a 2.1 year supply and the 2018 Housing Delivery Test measurement was just 75%.
- 2.12 Identifying a critical mass of housing in Edenfield is therefore necessary from a strategic perspective to counteract the viability issues that other areas of the Borough face and so can be justified on this basis in line with the findings of the evidence base, which has considered all other reasonable alternatives. Affordable Housing needs are also particularly acute in this area of the borough, with Tables 8.2 and 8.3 of the SHMA confirming that the Helmshore & Edenfield sub area has the highest proportion of both existing and newly formed households unable to purchase market housing. There is insufficient land available within the existing settlement boundary of Edenfield to accommodate this affordable housing need.
- 2.13 Anwyl Land are able to confirm that the land at Exchange Street, which forms the southern part of Housing Allocation H72 will be able to viably deliver around 90-100 homes and 30% affordable housing in line with the requirements of Policy HS6.

Effect on the function, form and identity of the village

- 2.14 Land off Exchange Street is located to the immediate north west of the existing settlement of Edenfield. The boundaries of the site are clearly defined by the access road along the northern and eastern boundaries, and the established woodland and strong boundary of the A56 to the west. Along the southern boundary, separated from the site by a watercourse and belt of trees, are the rear

gardens of properties along Eden Avenue, Woodlands Road and Oaklands Road. Whilst responding to the architecture of the adjacent existing development, the masterplanning process for the wider allocation will also respect the rural character of Edenfield.

- 2.15 The dwellings adjacent to the site to the south, along Eden Avenue, Oaklands Road and Woodlands Road are a mix of detached, semi-detached and mews properties. These are predominantly two storeys and of a more modern construction. The existing dwellings are a mix of materials including red brick, stone and clay tile roofs. Older stone properties are located along Exchange Street and Market Street.
- 2.16 The design principles set out under part (b) of Policy HS3 will be implemented through the detailed design of the scheme and the Combined Illustrative Masterplan for the wider site provided at Appendix A to this statement demonstrates how several of the key design criteria can be incorporated in order to ensure that the overall character of Edenfield continues to be respected.
- 2.17 For example, green infrastructure will be incorporated through the development to build upon the existing areas of landscaping, which will also create ecological linkages across the site and ensure an appropriate relationship is maintained with the surrounding properties and land uses. Existing public rights of way crossing the site will be retained and new linkages created across the site providing connections with the centre of the village and the surrounding countryside.

c) What effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Does the assessment in the Council's Green Belt Review give appropriate recognition to the site's strategic role in preventing the unrestricted sprawl of Manchester? What are the exceptional circumstances that justify altering the Green Belt in this case?

Effect of the proposed Green belt boundary change

- 2.18 The Council have undertaken a thorough assessment of the Green Belt across the Borough (Green Belt Review, November 2016) and this identified land to the west of Market Street as the only land around the edge of Edenfield which would be 'potentially suitable' for release from the Green Belt, without causing harm to the purposes or integrity of the wider Green Belt in Rossendale. The Green Belt Review found that the site performed weakly in Green Belt terms, partly because it is contained

by the A56 which forms a strong physical and visual barrier and the relevant parcel reference for land at Exchange Street is P44.

2.19 The Green Belt Review recognises that *‘the planned release of parcel P44, P43 and then P39, in that order, could be perceived as the main block of settlement within Edenfield growing incrementally north and filling the gap between the A56 and the linear settlement along Market Street. This could create a stronger Green Belt boundary and settlement edge.’*

2.20 Anwyl Land therefore support the Council’s recognition in the evidence base that the strong and defensible boundaries of the A56 and the existing development along Market Street presents a key opportunity to release a well contained area of Green Belt which makes only a limited contribution to the purposes of the Green Belt.

2.21 With regard to the five purposes for including land within the Green Belt set out at paragraph 134 of the Framework, the development of the land west of Market Street will:

- i. not result in unrestricted sprawl of the existing built-up area by virtue of the existing strong barrier of the A56;
- ii. not result in the merging of settlements, since the development will extend no further north than the existing edge of the settlement of Edenfield which stretches north along Market Street/ Burnley Road. The gap between Edenfield and Rawtenstall will therefore be retained;
- iii. be experienced as an incremental expansion of development on land which is already closely related to the existing urban edge which runs along the entire eastern and southern boundaries. The A56 along the western boundary then completely contains the site meaning the development would not amount to an encroachment into the wider countryside surrounding the settlement;
- iv. not have any significant impacts on the setting of the historic settlement of Ramsbottom;
- v. not harm the prospects of recycling urban land within the Borough since a thorough review undertaken to inform the Local Plan has demonstrated there are insufficient existing urban sites to meet Rossendale’s housing requirement over the entire Plan Period.

2.22 The proposed change to the Green Belt boundary can therefore be justified in this location.

The site's strategic role in preventing the unrestricted sprawl of Manchester

2.23 Our view is that whilst Edenfield is located at the fringe of Greater Manchester and has close functional links to it, it is a distinct settlement in its own right and the release of Green Belt to the north of the settlement (as is proposed) would not result in the merging of this settlement with the Greater Manchester conurbation to the south as the same significant buffer between Edenfield and Stubbins/Shuttleworth/Ramsbottom will remain unaltered.

Justification of exceptional circumstances in this case

2.24 Anwyl Land strongly support the Council's case that exceptional circumstances exist to justify the release of Green Belt for housing development, including within Edenfield. The Housing Topic Paper clearly sets out the steps that have been taken to lead to this conclusion and that it is evident, with reference to an assessment of all SHLAA sites, that there is an insufficient quantum of deliverable and developable sites available within the existing urban areas to meet Rossendale's housing needs in full during the plan period and so exceptional circumstances exist.

2.25 As set out in our response to question (b) above, there is specific justification to identify this site as a Housing Allocation in Edenfield because of the locational market characteristics and the need to boost affordable housing delivery in Edenfield and the viability issues that exist across the Borough as a whole.

d) What range of mechanisms to enhance the Green Belt are expected from developers, as set out in section e in Policy HS3? How does this fit with the requirement for developer contributions, as set out in Policy SD2? Is the specified enhancement of land between the site and Rawtenstall/Haslingden justified and deliverable?

2.26 Anwyl land have no specific comments in relation to this question, other than to confirm that they anticipate being able to deliver a policy compliant development on land at Exchange Street, with fair and reasonable planning contributions and on site affordable housing being provided in line with the requirements set out under Policies HS3 and SD2.

e) What are the key transport and access infrastructure requirements/costs associated with the proposed scheme? Are there any delivery issues or phasing implications? Has

any necessary third party land been secured for access? What is Lancashire County Council's and the Highways Agency's latest position?

2.27 No third party land is required to achieve the necessary access on to Exchange Street, nor are there any phasing or delivery issues associated with the development of the allocation as a whole. As indicated on the joint masterplan provided at Appendix A to this Statement, each parcel of land in the three separate land ownerships can be accessed independently but opportunities have also been taken to create pedestrian and cycle linkages between each parcel in consideration of a coherent approach to development across the allocation as a whole.

f) What scale and form of additional primary school provision would be needed to support the development? Is an expansion of Edenfield Primary School justified, deliverable and consistent with the Green Belt status of the land? If a new school is required, is there scope to accommodate this within the proposed allocation site, or elsewhere? What impact would on-site provision have on housing capacity? What provision is required for early years/childcare and secondary education facilities? What is Lancashire County Council's latest position?

2.28 In terms of the requirement for Primary School provision, as set out in the supporting text to Policy HS3 (paragraph 64), the Education Authority's preferred course of action is to expand Edenfield School.

2.29 It is anticipated that Anwyl Land's development at Exchange Street will provide the reasonable proportion of planning contributions requested by the Education Authority in line with policy requirements.

g) What other infrastructure provision is needed to support the development? Should the level of provision/further detail be specified in Policy HS3?

2.30 The technical and viability work undertaken so far at the Exchange Street site and the allocation as a whole, along with the evidence base confirms that the infrastructure requirements established under this policy can be provided as part of the scheme. Alongside 30% affordable housing, Anwyl Land are committed towards the delivery of key infrastructure items identified under Policy HS3 that are reasonably related to the site itself, specifically public open space (on site and/or by planning

contribution) and education (by planning contribution) in consultation with the Council and relevant statutory consultees.

h) What geotechnical work has been undertaken on the proposed site? What mitigation measures are necessary to ensure effective development and to resolve the concerns of Highways England?

- 2.31 A Ground Conditions Desk Study has been prepared by Hydrock in respect of the land at Exchange Street and no risks in respect of the future development of the site have been identified at this stage.
- 2.32 Additional ground survey evidence has been provided to Highways England to address their initial concerns and it is understood that there have been ongoing discussions, the outcome of which will be confirmed during the Examination process.

i) Have other constraints including heritage, biodiversity and trees, flood risk, drainage, noise, air quality and contamination been satisfactorily investigated and addressed? Are related mitigation measures/requirements necessary and clearly expressed in Policy HS3?

- 2.33 A suite of technical reports have been produced specifically in relation to the land at Exchange Street. The following is a brief summary of the findings:

- **Heritage:** The nearest Conservation Area to the site is the Chatterton and Strongstry Conservation Area to the west. The Site has no association or visual connection with the Conservation Area by virtue of the A56 and area of dense woodland in the south-western part of the site, which provides a strong visual barrier. In Edenfield itself, the Grade II* Listed Edenfield Parish Church lies to adjacent to the eastern boundary of the northern part of the wider allocation. The Combined Illustrative Masterplan shows that through careful design, the setting of the Church will be preserved. The Heritage Impact Assessment of Housing and Employment Sites (August 2018) produced by the Council to inform the Local Plan concludes that the development of the site is acceptable in heritage terms, subject to appropriate mitigation measures. The heritage and character of the existing village will be reflected through the architectural detailing and choice of materials in the new development. This can be secured through the Design Code.

- **Highways:** CBO Transport have confirmed that a 5.5m wide vehicular access can be provided for this parcel of residential development via Exchange Street. There is an existing footway along the south side of Exchange Street which provides pedestrian connectivity between the site and the village centre. Croft Transport Solutions have also been appointed to provide highways advice in respect of proposed Housing Allocation H72 and their work has concluded that the delivery of the whole allocation will not have an adverse impact upon the wider highway network, which has sufficient capacity to accommodate the proposed development. Any localised off site highway works deemed necessary will be specified at the time of submission of individual planning applications.
- **Flooding:** The entire site is located within Flood Risk Zone 1 with reference to the Environment Agency flood maps. Residential development would therefore be entirely acceptable in line with national guidance on flood risk. Hydrock have been instructed to prepare a Flood Risk Assessment, which confirms that the proposed development of the site would not give rise to increased flood risk elsewhere. It has also been demonstrated that adequate drainage for the site could be designed in a manner which utilises the natural topography of the site and incorporates sustainable drainage systems.
- **Ecology:** Appletons have produced a Preliminary Ecological Appraisal. This confirms that the majority of habitats on the site are common and of limited value. The existing trees and woodland do however provide opportunities for wildlife. The woodland and majority of trees will be retained and incorporated as part of any future development and the Ecology Appraisal submitted to support these representations recommends measures to enhance the retained woodland and achieve a net gain for biodiversity as a result of the development.
- **Noise:** In recognition of the site's location adjacent to the A56, Hydrock have assessed the suitability of the site for development in terms of the existing acoustic environment. The Acoustic Assessment confirms that the areas proposed for housing are predicted to fall into the 'low' and 'medium' risk categories for noise impacts from the A56. Accordingly, it confirms that subject to the incorporation of suitable mitigation measures in the detailed design process, the site can be considered suitable for housing development from a noise impact perspective.

- **Ground:** As confirmed above, Hydrock have also undertaken a Ground Conditions Desk Study. The overall risk from land contamination at the site is considered to be low, as the area of the proposed housing development is greenfield having remained free from development.

j) What is the net developable area (15.25 hectares) based on, and is it justified? Does it take account of potential future road widening on the A56, as identified in the Local Plan Highways Capacity Study?

2.34 The combined masterplan provided at Appendix A demonstrates that around 400 dwellings can be delivered across the whole allocation taking all physical and technical constraints into account and so a net developable area of 15.25 is considered to represent a reasonable and justified calculation.

2.35 The land at Exchange Street is considered capable of delivering around 90-100 dwellings.

k) Is the site capacity of 400 dwellings appropriate, taking account of constraints and infrastructure provision?

2.36 As stated in response to question (j), the overall site capacity of around 400 dwellings is justified and based upon known constraints and a range of technical studies.

l) Why is the northern boundary of the site allocation, as shown on the Policies Map, different to the proposed development area on the Combined Illustrative Masterplan? Is the northern section no longer required for development purposes? What is the gross and net site area shown in the Masterplan?

2.37 Anwyl Land have no specific comments to submit in response to this question.

m) Is the site available and deliverable in the timescales envisaged as set out within the housing trajectory in the Council's response to the Inspector's Pre-Hearing Note?

2.38 Anwyl Land can confirm that the land at Exchange Street, which forms the southern section of the allocation is available and deliverable and the intention is to submit a planning application for consideration upon adoption of the Local Plan and first housing completions can be achieved within 5 years subject to the receipt of the necessary consents.

Appendix A: Combined Illustrative Masterplan for Site H72: Land West of Market Street





Hive Land & Planning

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