



**Edenfield Community Neighbourhood Forum
Rossendale Local Plan Examination**

30th August 2019

Matter 7 – Infrastructure delivery

Issue - Does the Plan set out a robust framework for infrastructure delivery which is justified, effective and consistent with national policy?

[Policy SS

Policy SD3]

Questions

- a) Does the Infrastructure Delivery Plan (2018) and the 2019 update (SD014 & SD015) provide a thorough assessment of infrastructure needs, and reflect levels of growth in the Local Plan?**

Response:

Yes, but only in terms of the [2019 Infrastructure Delivery Plan \(IDP\) Update](#) being comprehensive regarding the types of infrastructure needed - but not with regard to the [2018 Plan](#) itself, nor the detail of either's content.

While the documents seek to reflect the Local Plan's levels of growth, Edenfield Community Neighbourhood Forum (ECNF) would firstly point out that omissions in the 2018 Infrastructure Delivery Plan (IDP) were extensive and highly significant in terms of their consequences. Of key concern is how for transport, the Plan focused on highways infrastructure and cycling networks, but did not review bus, rail and walking provision. While this error has been addressed in the IDP 2019 Update, it having been made in the 2018 IDP undermines the Local Plan's site allocations and policies extensively. A key and unacceptable consequence is that – ECNF assumes – these elements of transport infrastructure were not considered in relation to major development site allocations, including the land for 400 new homes to the west of Market Street in Edenfield.

The Forum is more concerned that the IDP may have contributed to an unsustainable and unsound Local Plan, in particular because it has failed in both iterations to recognise the significant infrastructure deficiencies and issues in and around Edenfield. As stated in ECNF's representations on the Publication Local Plan, local roads and the strategic road network are congested at peak times - yet in both the IDP and the Council's transport assessment work to date, there seems to be no thorough understanding of the constraints to development and the scale of the highway infrastructure improvements that would be required to accommodate the three large-scale site allocations in Edenfield (totaling 456 homes). ECNF's transport consultants in their 'Development Access and Capacity Review' (submitted to the Examination by ECNF) have concluded (para. 3.7):



“The technical work prepared by the Council and site promoters to date has not appropriately assessed the impact of the scale of residential development on the village.”

With the IDP having failed to consider transport modes other than the private car, the Local Plan itself – and its wider evidence base e.g. in terms of sustainability and whole plan viability – has to be found unsound. ECNF would have assumed that looking at bus services in this context would be critical.

ECNF’s fundamental issue however with both IDP documents remains more that they are derived from/ based on the unsound evidence base that underlies the Local Plan, and the Plan’s unsound policies themselves. This is particularly the case with regard to the IDPs not having taken into account all of the relevant baseline information, nor planned for all of the infrastructure needs and requirements inevitably relating to the Plan’s housing and employment allocations. In that regard, ECNF’s main area of concern is that insufficient consideration has been given to the scale, type and timing of the transport and social infrastructure that would be needed – and its cost - to serve those sites that are unnecessarily proposed for removal from the Green Belt for residential, B1, 2 and 8 uses, and mixed-use development.

b) What is the justification for including site specific infrastructure requirements for some sites proposed for allocation and not others?

Response:

Rossendale Borough Council should answer this question.

c) Is there a reasonable likelihood that the specific infrastructure projects identified in SD014 & SD015 will be delivered when they are required? Particularly:

- i. Is the Rawtenstall Gyratory deliverable? Have the concerns of Lancashire Fire and Rescue been addressed? Can the scheme be delivered with the Fire Station remaining in place? If not has a strategy been agreed for its relocation which includes funding and timing? Is there an overall strategy which demonstrates the Rawtenstall Gyratory is deliverable and when it would be likely to be delivered? What would be the implications for the Local Plan if this scheme was not delivered on time or at all?

Response:

ECNF does not have any comment to make in reply to these questions.

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- d) Is the approach to developer contributions, as set out in Policy SD3, effective and soundly based? Should it include reference to contributions towards or provision of Suitable Alternative Natural Green Space?

Response:

ECNF does not have any comment to make in reply to these questions.

Yours sincerely,

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