

**SCHEDULE OF ACTIONS MATTER 8 AND 15 (Action 8.10, 15.6, 15.7 and 15.9)**

**Compensation Measures for Green Belt Release**

<b>8.10</b>	<b>Produce a paper setting out a strategy and list of potential sites/schemes which could provide compensation for GB loss i.e. how/where/when/what</b>
<b>15.6</b>	<b>NE1 – Extension to Mayfield Chicks: Produce note on Green Belt compensation</b>
<b>15.7</b>	<b>NE2 – Land north of Hud Hey: Address Green Belt compensation</b>
<b>15.9</b>	<b>NE4 – Extension of New Hall Hey: Address Green Belt compensation</b>

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*NOTE TO INSPECTORS: This report does not include the response to Action 8.11 (“Include costs of Green Belt loss compensatory measures in Viability Assessment”). The response to 8.11 will be set out in a separate paper but will be informed by the potential measures discussed below.*

**1 Introduction**

1.1 In order to provide sufficient housing and employment land to meet expected requirements, Rossendale Borough Council has identified the need to allocate land within the existing Green Belt for development. This will involve the de-designation of the land as Green Belt. The “exceptional circumstances” which exist to justify Green Belt release are set out in the response to Action 8.12.

1.2 This note provides more information on compensatory measures which could be implemented in order to offset this Green Belt loss, as required in the National Planning Policy Framework (NPPF). At this stage, this note provides a starting point highlighting the type of measures and schemes that could be provided. Further and more detailed work will be undertaken as the Local Plan progresses. This will involve close involvement with other sections of the Council, including Economic Development and the Operations team (particularly in relation to access and enhancements to existing recreational space), Lancashire County Council and bodies such as the Lancashire Wildlife Trust (in relation to enhancing biodiversity value of the allocations and the surrounding remaining Green Belt).

## 2 National planning context

### NPPF

2.1 Paragraph 138 of NPPF states that, where it has been concluded that it is necessary to release Green Belt land for development, plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

2.2 NPPF goes on to state in paragraph 141 that: *“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*

### Planning Policy Guidance (PPG)

2.3 PPG on Green Belt states that compensatory improvements may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- new or enhanced [green infrastructure](#);
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- [improvements to biodiversity](#), habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

2.4 It goes on to recommend that identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:

- land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;

- the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for [deliverability](#);
- the appropriate use of [conditions](#) and [section 106 obligations](#) to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites.

### 3 Green Belt release in Rossendale

3.1 The enhancement of remaining Green Belt land would necessitate the delivery of initiatives on land which is not proposed for release for development. This could be through the delivery of strategic initiatives, for example the creation of a new community woodland or local nature reserves, somewhere within the Borough's Green Belt, or through enhancements next to the sites proposed for release (or a combination of both). Whilst recognising that land released from the Green Belt can still to an extent remain open and provide beneficial uses of the types suggested by the NPPF, this note focusses on the potential opportunities to enhance Green Belt land adjacent, or in close proximity to the sites proposed for release.

3.2 A Green Belt Review was undertaken to inform the preparation of the Local Plan in 2016. Whilst this assessment did not provide the "exceptional circumstances" for loss of Green Belt, it was able to identify which parcels or sub-parcels of Green Belt land could, potentially, be released (subject to this release being justified in the first place). This was achieved by assessing the existing Green Belt against the five purposes of Green Belt and identifying whether it still met these objectives. It also assessed the potential harm that development of any parcel would have on the remaining Green Belt. In this way, the Review was able to recommend which parcels/sub-parcels would cause least harm if they were to be released from the Green Belt.

3.3 The findings from this were used to inform the allocation of development sites. Wherever possible, those parcels of Green Belt which were felt to have the least potential harm to the Green Belt if they were developed (and were recommended for release) were chosen for allocation. In some cases, however, sites which were not recommended for release were allocated, due to other overriding circumstances. This is set out in the Exceptional Circumstances paper. In these cases, the review set out some possible mitigation measures which could contribute towards minimising the effect of the release on the openness of the remaining Green Belt.

### 4 Enhancing green infrastructure

4.1 Green infrastructure (GI) is defined in the NPPF as: *"a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities."* Compensatory measures may include identifying opportunities to enhance green infrastructure on Green Belt land adjacent, or in close proximity to the proposed release sites, recognising the multifunctional benefits that this could bring.

4.2 NPPF makes clear that planning policies and decision-making should seek to protect and enhance natural and heritage assets and encourage multiple benefits from land use. GI is multi-functional as it can provide a wide range of environmental and social benefits. This includes improving health and wellbeing, climate change adaptation, enhancing landscape, heritage and sense of place, as well as improving biodiversity.

4.3 The compensatory measures set out in this paper all fall under the umbrella of enhancing green infrastructure: improving access, providing opportunities for outdoor sport and recreation, retaining and enhancing areas of landscape value, visual amenity and biodiversity and improving damaged and derelict land.

## **5 Existing Green Infrastructure evidence**

5.1 The information from the following studies can be used to inform the identification of potential compensatory measures for land connected with Green Belt release sites.

### **Lancashire Ecological Network Approach and Analysis 2015**

5.2 The Lancashire Ecological Network seeks to identify linkages between known wildlife sites, using existing data about sites, habitats and species preferences. This data is evaluated to identify areas of high 'landscape integrity' where habitats are in relatively natural condition and have lower levels of human modification.

### **Rossendale Environmental Network Study 2017**

5.3 One of the objectives of this study was to identify the key components of Rossendale's environmental network, advise on policy for protection and enhancement and to set out measures to identify and address gaps in the network. The study recommended that the Borough's environmental network should comprise of "rural networks" (connecting corridors consisting of core nature areas such as SSSIs, Biological Heritage Sites<sup>1</sup> and different habitat types), "valley networks" (including river valleys and linear recreation corridors) and "Greenlands" sites (areas identified for protection for amenity, recreation, biodiversity and community uses). The study went on to highlight the multiple benefits of these and identified various means of enhancing the function of the sites.

### **Open Space Review 2005**

5.4 This review identified the type, function and location of open space within Rossendale, providing a vision for each typology, as well as highlighting deficiencies in provision.

### **Open Space Strategy 2008**

5.5 This Strategy was commissioned to build on the findings of the Open Space Review and provides an action plan for future improvement and management of the Borough's open spaces, including enhancing access to them. This includes open space within and adjacent to the Green Belt.

### **Emerging Open Space Assessment**

5.6 The Council are currently preparing Open Space, Sports Facilities and Playing Pitch Assessments. These will audit the quantity, quality and accessibility of all existing open spaces and other sport and recreation facilities and provide recommendations on provision standards, opportunities for enhancement and future investment priorities. The open space

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<sup>1</sup> Sites designated for their high biodiversity value but which do not receive full statutory protection (e.g. Local Wildlife Sites, known in Lancashire as "Biological Heritage Sites")

and indoor sports assessment is due to be complete by April 2020, with the playing pitch strategy to follow later in the year.

## Landscape Study 2015/2017

5.7 This study provided landscape appraisals of all sites which were identified as having landscape sensitivity in the Borough, including sites identified by the Council and potential developers. The assessment was prepared from a landscape character perspective, to identify areas which are suitable for development and suggest mitigation measures if required. Where relevant, some of these mitigation measures may be useful in identifying potential compensatory measures for Green Belt release.

## 6 Proposed allocations involving Green Belt release and potential compensatory measures

6.1 The following sets out some potential measures which could be taken to improve the environmental quality and accessibility of remaining Green Belt land around the proposed allocations involving Green Belt release. The Council feel this is particularly important for those sites which were not necessarily recommended for release in the Green Belt Review and where greater levels of mitigation would be expected to reduce any potential harm. In some cases, particularly for smaller sites, not all the potential compensatory measures will be necessary.

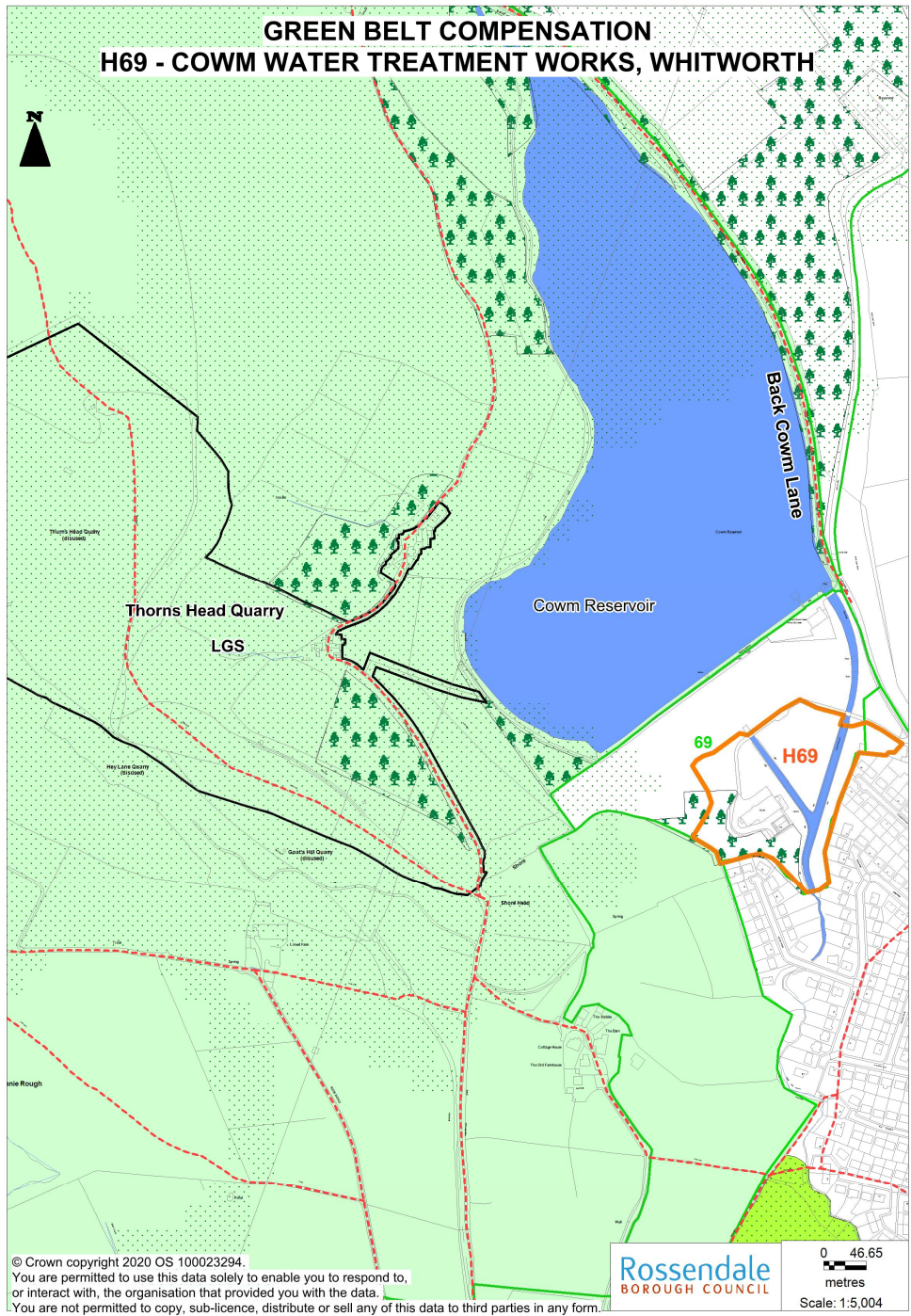
### H69 - Cwm Water Treatment Works, Whitworth



Green Belt Review findings:  
GB Parcel 69  
Medium degree of harm if developed  
Potential for release

6.2 This site is the location of the former Treatment Works for Cwm Reservoir which are being decommissioned. It forms part of the dam wall. As well as being partly brownfield, the Green Belt Study (Parcel 69) considers the land suitable for release in Green Belt terms subject to development being low density housing of two stories or less with suitable planting. The existing access may need improving.

Potential compensatory measures:



**MAP KEY**

- Public Rights of Way**  
 — Rossendale Way  
 ●●●● Pennine Bridleway  
 ●●●● Inwell Sculpture Trail  
 — Existing or Proposed Cycle Route  
 - - - - Other PROW

- Proposed Allocations**  
 ■ Mixed-use  
 ■ Housing  
 ■ Employment

- Green Belt**  
 ■ Green Belt (as shown on Submission Version of the Local Plan)  
 ■ Green Belt Parcels assessed in Green Belt Review  
 ■ Council Owned Land Relevant to Green Belt Compensation

- Natural and Built Environment**  
 ■ Site of Special Scientific Interest (SSSI)  
 ■ Biological Heritage Site (BHS)  
 ■ Local Geodiversity Site (LGS)  
 ■ Important Wildlife Site (IWS)  
 ■ Green Infrastructure (including Greenlands and ecological network)  
 ■ Blue Infrastructure  
 ■ Open Space (including Greenlands and Recreation Areas)  
 ■ Accessible and Ancient Woodlands  
 ■ Conservation Area

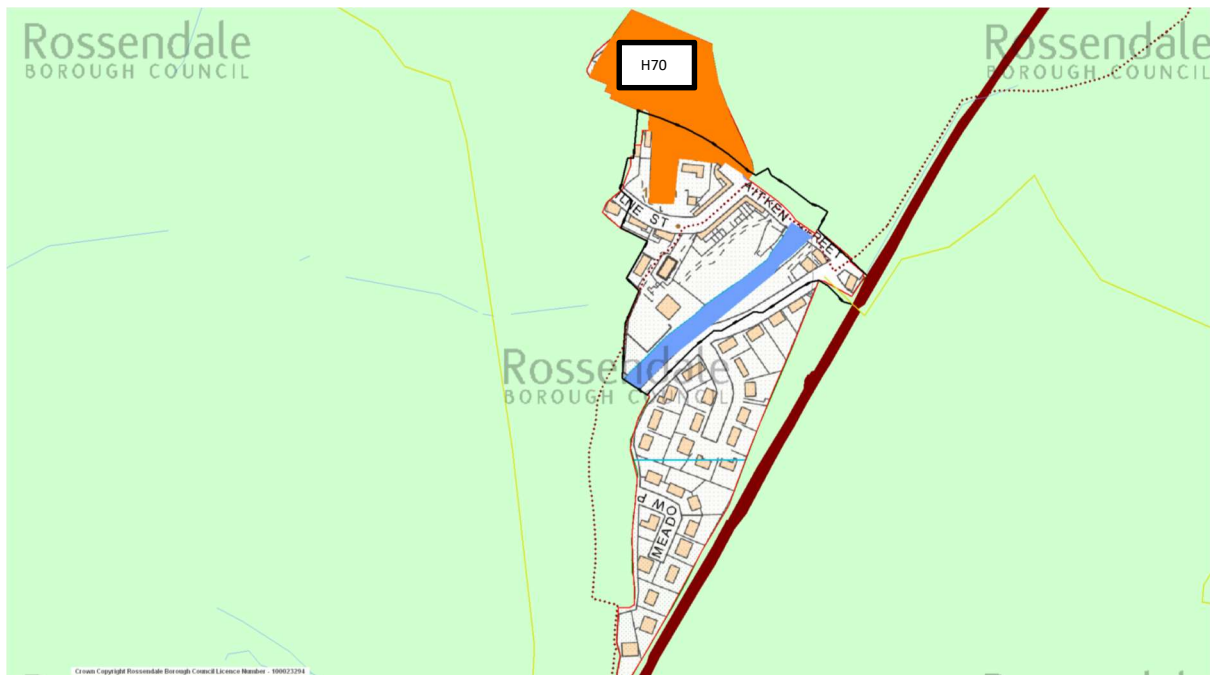
Theme	Measure	Opportunities
Access	Enhance links to cycle way and PROW	The site is adjacent to Cowm Reservoir which is in the Green Belt and is publicly accessible for walking and recreation. PROW exist to the east and west of the site and there is a footpath along the edge of the dam, just to the north of the site. Both of these can be easily accessed from the site and this direct access should be retained and enhanced as part of any development. These paths link to longer routes and the wider path network within the Green Belt and beyond, including to the Pennine Bridleway. There are several areas of accessible woodland, within and in close proximity to the site, including around Cowm Reservoir and access to these should be retained or enhanced, where necessary. The disused Thorns Head and Hey Lane Quarries are just to the west of the site and can be accessed by PROW. Opportunities to enhance public access to these could be investigated and new or enhanced links to these directly from the site could be provided (whilst respecting any biodiversity/geodiversity within the area).
Sport and recreation	Enhance links to nearby recreation grounds	Cowm Reservoir provides recreational opportunities, including extensive footpaths and water-skiing, both in very close proximity. Direct access to the path network from the allocation should be retained and enhanced as part of any development. Opportunities to enhance the recreational benefits of the disused quarries to the west of the site could be investigated, for example to provide mountain biking routes and new or enhanced walking and cycling links directly from the allocation could be provided.
Biodiversity and wildlife corridors	Enhance biodiversity corridors	There are several areas of woodland within and in close proximity to the site. Areas within the site should be retained as far as possible and enhanced as part of the development; opportunities to provide further tree planting, particularly if this would link with existing woodland could be explored. Any watercourses within the site which have biodiversity value should be protected. The disused Thorns Head and Hey Lane Quarries form part of a Local Geodiversity Site, identified partly due to the industrial archaeology in this area; opportunities to discover more about the geodiversity <sup>2</sup> value of this area could be explored.
Landscape and visual amenity	Retain and enhance existing landscape features	Existing woodland within the site should be retained as far as possible and enhanced where possible (particularly where it could link to existing woodland outside the site); this will help to enhance the visual quality of the development and screen new buildings as viewed from Back Cowm Lane, footpaths along the reservoir and existing housing to the south and east. Existing watercourses could be enhanced as an amenity feature within the site, where appropriate.

<sup>2</sup> Geodiversity may be defined as the natural range (diversity) of geological features (rocks, minerals, fossils, structures), geomorphological features (landforms and processes) and soil features that make up the landscape i.e. the non-biological aspects of nature





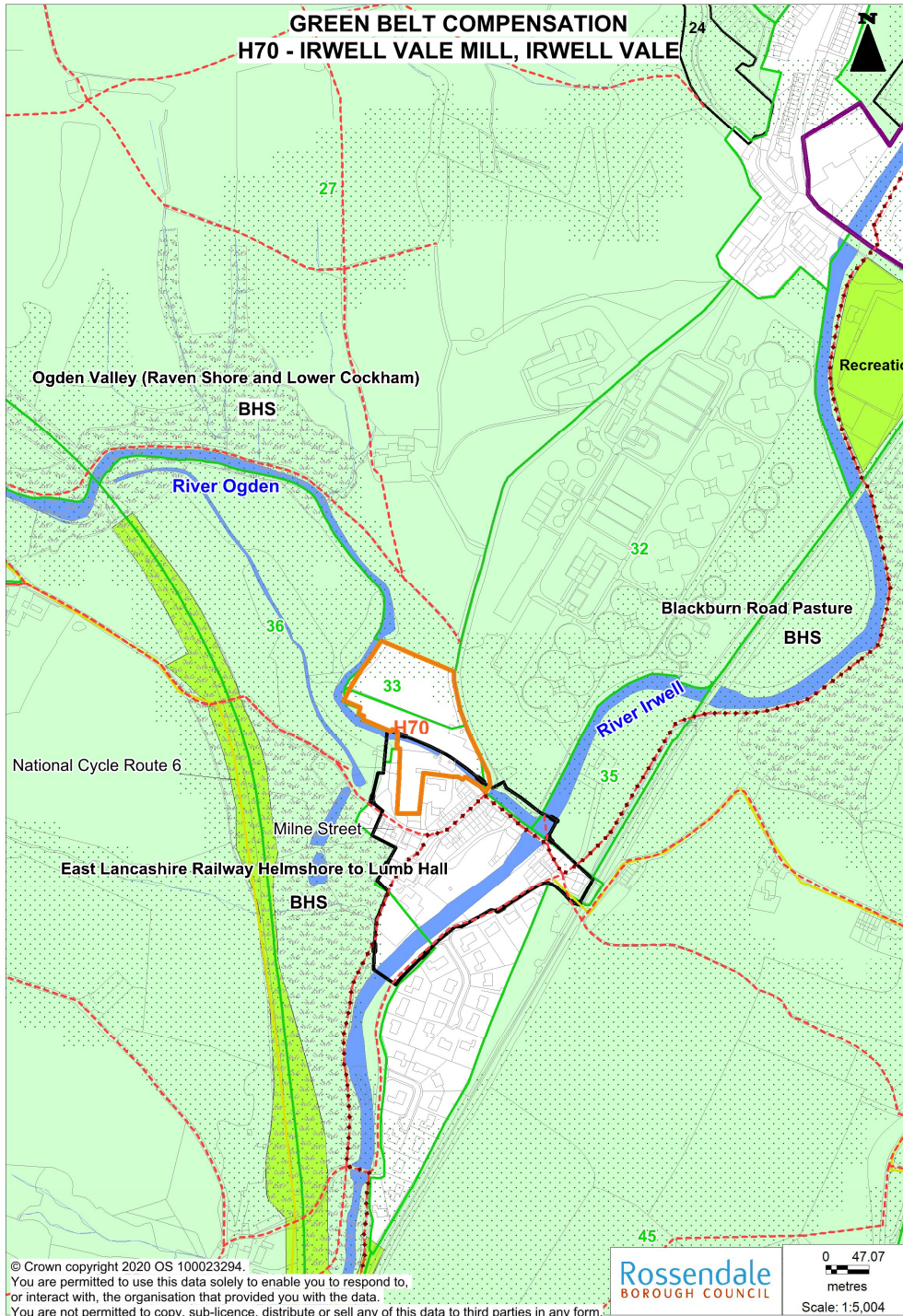
## H70 - Irwell Vale Mill



Green Belt Review findings:  
GB Parcel 33 (northern part of allocation)  
Medium degree of harm  
Potential for release

6.3 This proposed allocation is located to the north of the small settlement of Irwell Vale, to the south east of Helmshore. It is a mixed brown/greenfield site, with the greenfield section to the north involving Green Belt release. The brownfield section consists of industrial/mill buildings and is within the existing urban boundary.

### Potential compensatory measures:



**MAP KEY**

- Public Rights of Way**
- Rossendale Way
  - Pennine Bridleway
  - Inwell Sculpture Trail
  - Existing or Proposed Cycle Route
  - Other PROW

**Proposed Allocations**

- Mixed-use
- Housing
- Employment

**Green Belt**

- Green Belt (as shown on Submission Version of the Local Plan)
- Green Belt Parcels assessed in Green Belt Review
- Council Owned Land Relevant to Green Belt Compensation

**Natural and Built Environment**

- Site of Special Scientific Interest (SSSI)
- Biological Heritage Site (BHS)
- Local Geodiversity Site (LGS)
- Important Wildlife Site (IWS)
- Green Infrastructure (including Greenlands and ecological network)
- Blue Infrastructure
- Open Space (including Greenlands and Recreation Areas)
- Accessible and Ancient Woodlands
- Conservation Area

<b>Theme</b>	<b>Measure</b>	<b>Opportunities</b>
Access	Enhance links to cycle way and PRow	Existing PRow run to the north and east of the allocation boundary and from the end of Milne Street, close to the southern boundary. These paths link to the wider network in the surrounding Green Belt, including to the nearby green corridor formed by the former railway to the west, which is also part of National Cycle Route 6, and to riverside walks to the north and south along the River Ogden. Any new development should retain and enhance these paths, including ensuring that direct access can be made from the development to the path network. Appropriate signage and information, for example route maps showing circular walks or links to the wider network and public transport, could be provided.
Sport and recreation	Enhance links to nearby recreation grounds	Direct access to the path network from the allocation should be retained and enhanced as part of any development. This may include contribution to enhance or help to maintain the National Cycle Network along the former railway to the west.
Biodiversity and wildlife corridors	Enhance biodiversity corridors	The green corridor to the west, which is linked by PRow and footpaths from the site, is identified as a Biological Heritage Site. As well as contributions towards enhancing the recreational use of this corridor, enhancements to biodiversity value should also be sought.
Landscape and visual amenity	Retain and enhance existing landscape features	The Landscape Study suggests a number of mitigation measures which would help to reduce any visual impact of new development on the surrounding Green Belt. These include: <ul style="list-style-type: none"> <li>• Development should reflect that this is on the main route into Irwell Vale, so is a highly visible gateway site;</li> <li>• A sensitive design brief could be developed that would allow an appropriate and attractive small scale housing scheme of a similar scale, style and type as the housing in the Conservation Area.</li> <li>• Phased removal of existing conifer belt and replacement with deciduous trees, including along the road frontage, more in keeping with valley that will provide a more subtle screen to any new development.</li> <li>• Reinstatement of cast iron railings along road frontage, use of stone flags for paving and stone kerbs.</li> </ul>

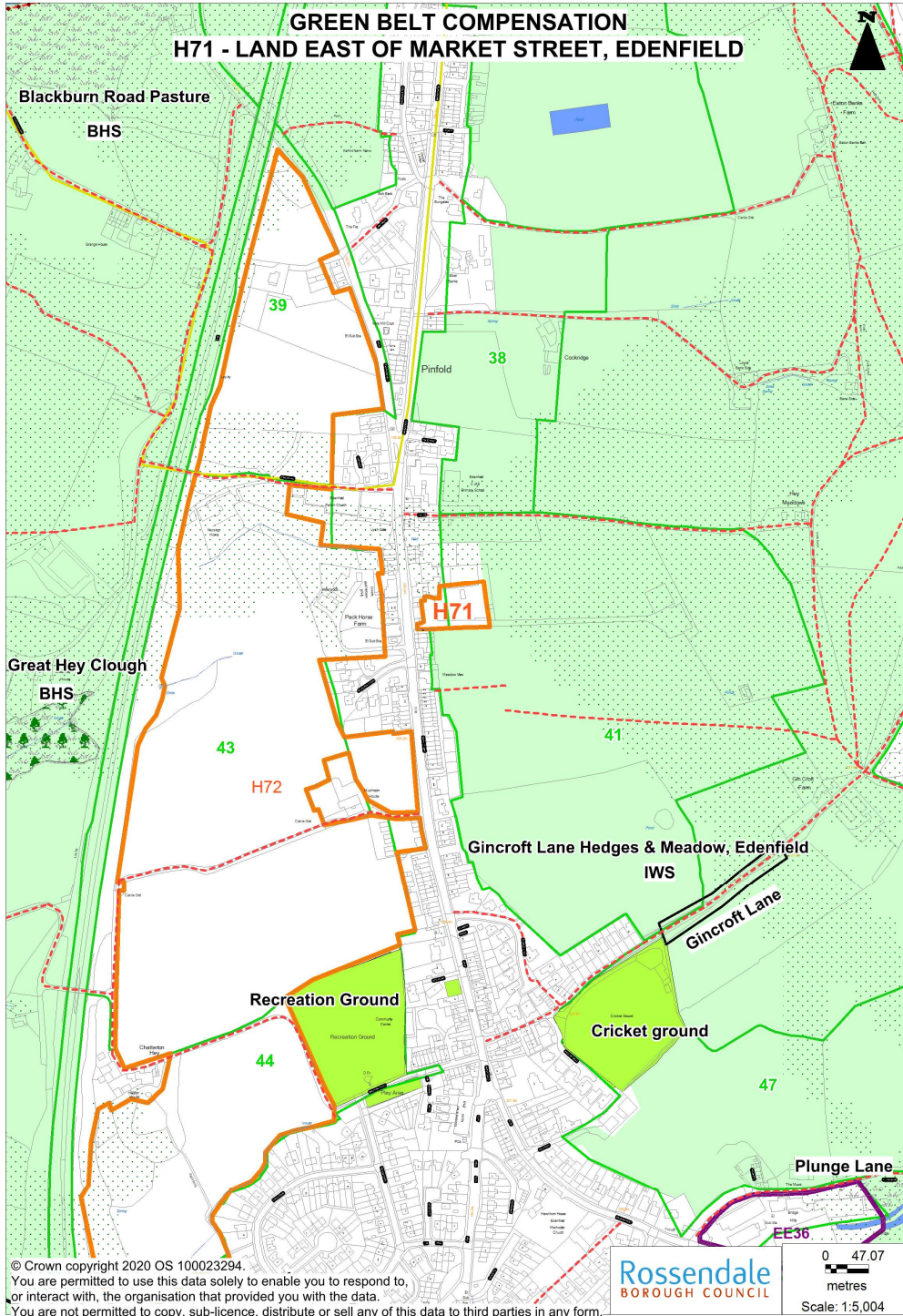
## H71 - Land east of Market Street, Edenfield



Green Belt Review findings:  
GB Parcel 41 (the allocation is a small part of the wider parcel)  
High degree of harm  
Wider parcel not recommended for release

6.4 This allocation involves a relatively small release of the existing Green Belt to accommodate approximately 9 dwellings. It is a brownfield site and is currently used for storage.

### Potential compensatory measures:



**MAP KEY**

- Public Rights of Way**
- Rossendale Way
  - Pennine Bridleway
  - Inwell Sculpture Trail
  - Existing or Proposed Cycle Route
  - - - Other PROW

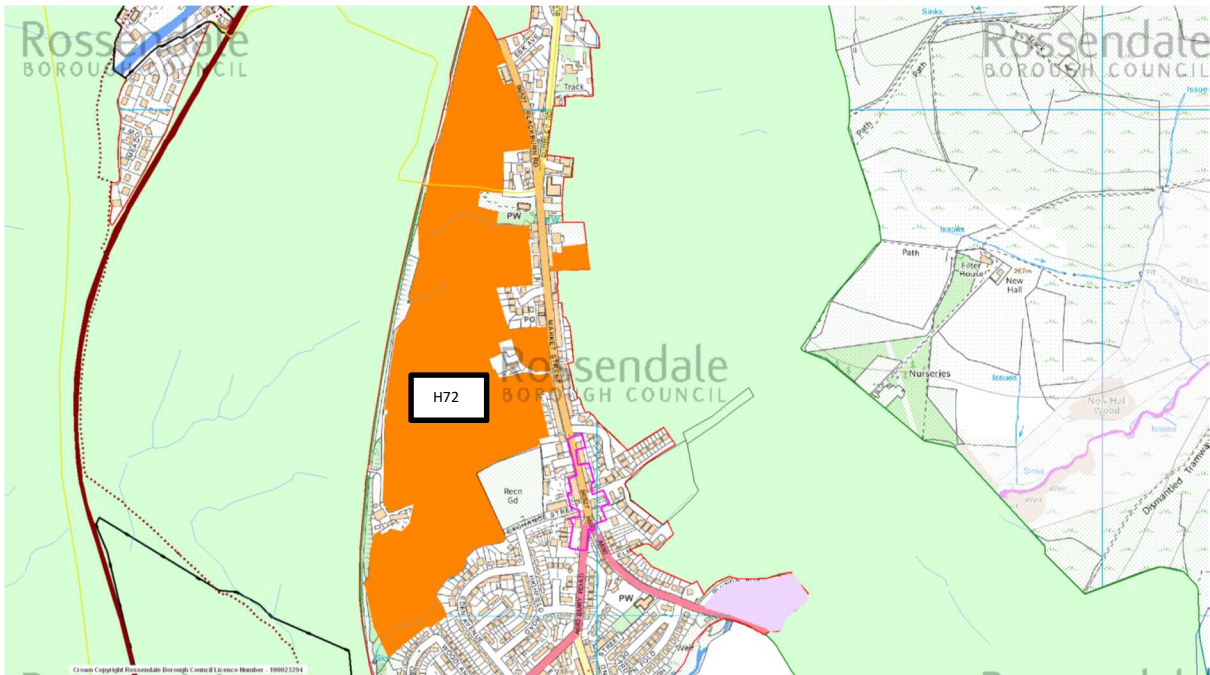
- Proposed Allocations**
- Mixed-use
  - Housing
  - Employment

- Green Belt**
- Green Belt (as shown on Submission Version of the Local Plan)
  - Green Belt Parcels assessed in Green Belt Review
  - Council Owned Land Relevant to Green Belt Compensation

- Natural and Built Environment**
- Site of Special Scientific Interest (SSSI)
  - Biological Heritage Site (BHS)
  - Local Geodiversity Site (LGS)
  - Important Wildlife Site (IWS)
  - Green Infrastructure (including Greenlands and ecological network)
  - Blue Infrastructure
  - Open Space (including Greenlands and Recreation Areas)
  - Accessible and Ancient Woodlands
  - Conservation Area

<b>Theme</b>	<b>Measure</b>	<b>Opportunities</b>
Access	Enhance links to cycle way and PRow	There is a PRow to the north of the site, along a small lane, which links to the wider path network in the surrounding Green Belt. Direct footpath access to this from the allocation could be sought, as well as enhancements to the existing path.
Sport and recreation	Enhance links to nearby recreation grounds	Existing PRow allow access to the wider path network, providing recreational opportunities. The PRow to the north eventually provides access to the cricket ground along Gin Croft Lane, although this would not be the most direct route. Direct access to the path network from the allocation could be provided and existing paths enhanced as part of any development.
Biodiversity and wildlife corridors	Enhance biodiversity corridors	There is an area of woodland to the north of the site in the remaining Green Belt and contributions to enhance the biodiversity of this could be sought. Existing PRow also allow access to other Important Wildlife Site and woodland in the surrounding Green Belt, at Gin Croft Lane and Plunge Lane to the south.
Landscape and visual amenity	Retain and enhance existing landscape features	Additional tree planting and landscaping should screen the allocation as far possible, with the aim to provide a visual link to the existing woodland to the north. The will help to ensure that development does not protrude too obviously into the open countryside at this point and will help to enhance the visual quality of the development and screen new buildings as viewed from Market Street and the remaining Green Belt.

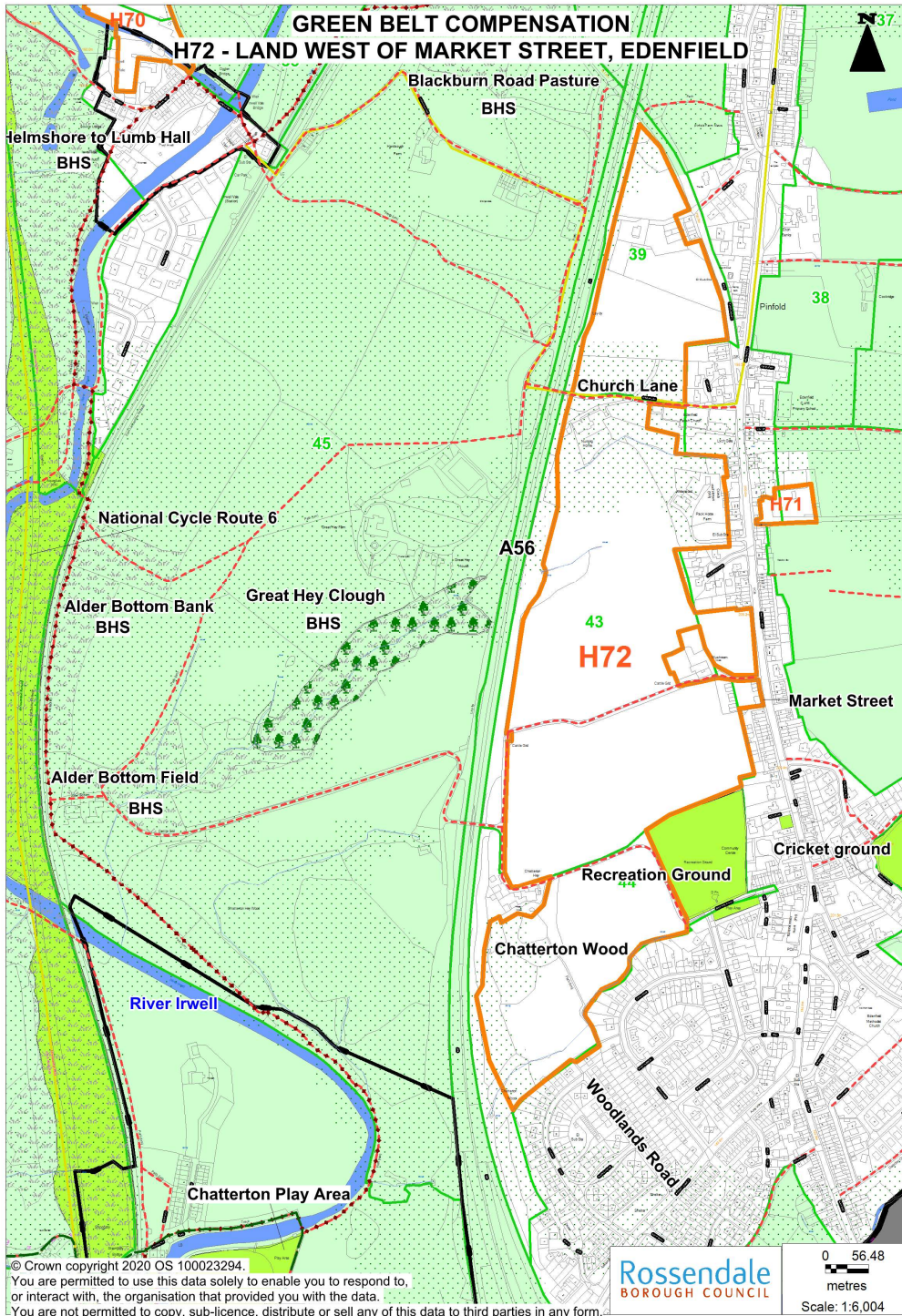
## H72 - Land west of Market Street, Edenfield



Green Belt Review findings:  
GB Parcels 39, 43, 44  
Medium degree of harm  
Potential for release

6.5 This is the largest housing allocation in the emerging Local Plan with an indicative capacity of 400 dwellings. A masterplan will be drawn up to guide development here, which will include appropriate compensatory measures.

Potential compensatory measures:



**MAP KEY**

- Public Rights of Way**
- Rossendale Way
  - Pennine Bridleway
  - Irwell Sculpture Trail
  - Existing or Proposed Cycle Route
  - Other PROW

- Proposed Allocations**
- Mixed-use
  - Housing
  - Employment

**Green Belt**

- Green Belt (as shown on Submission Version of the Local Plan)
- Green Belt Parcels assessed in Green Belt Review
- Council Owned Land Relevant to Green Belt Compensation

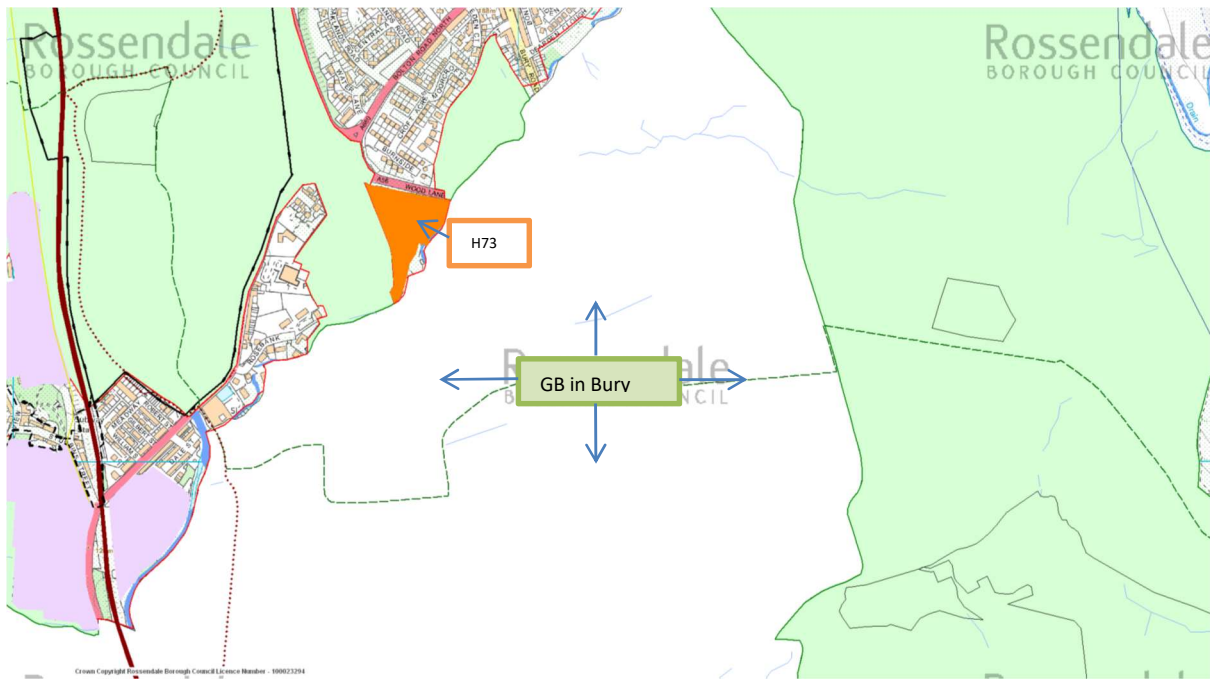
**Natural and Built Environment**

- Site of Special Scientific Interest (SSSI)
- Biological Heritage Site (BHS)
- Local Geodiversity Site (LGS)
- Important Wildlife Site (IWS)
- Green Infrastructure (including Greenlands and ecological network)
- Blue Infrastructure
- Open Space (including Greenlands and Recreation Areas)
- Accessible and Ancient Woodlands
- Conservation Area



<b>Theme</b>	<b>Measure</b>	<b>Opportunities</b>
Access	Enhance links to cycle way and PRoW	Existing PRoW can be found within the allocation, which link to the wider network in the remaining Green Belt on the other side of the A56 and Market Street. These eventually link to riverside walks along the River Irwell and pass along the green corridor formed by the former railway and which now forms part of National Cycle Route 6. These must be retained and enhanced with links to the wider network kept free from obstruction, particularly where these cross the A56. The Landscape Study suggests that a new area of public open space could be created to the south of the site, alongside the existing stream, where steep slopes would make development difficult. New paths could also link in with the existing public footpath network in this area and pedestrian links should be maintained from the end of Woodlands Road. Appropriate signage and information, for example route maps showing circular walks or links to the wider network and public transport, could be provided.
Sport and recreation	Enhance links to nearby recreation grounds	Existing PRoW must be retained and enhanced with links to the wider network kept free from obstruction, particularly where these cross the A56. Direct links from the allocation to the recreation area to the south east of the allocation should be provided, as should a link to the cricket ground within Green Belt on the other side of Market Street. A more direct link to the recreation and play area in Chatterton could also be provided from the south. Developer contributions to enhance these recreational facilities could also be required.
Biodiversity and wildlife corridors	Enhance biodiversity corridors	There are several areas of woodland within and in close proximity to the site, including to the north and south of Church Lane and at Chatterton Wood to the south. Areas within the site should be retained as far as possible and enhanced through the development; opportunities to provide further tree planting, particularly if this would link with existing woodland could be explored. Any watercourses within the site which have biodiversity value should be protected. There is an area of Ancient Woodland at Great Hey Clough to the other side of the A56 and any opportunities to enhance the biodiversity value of this and other BHS sites in the area through contributions from the development could be explored. Any opportunities to provide a continuous link for wildlife between habitat areas in the allocation and the wider network should be explored, for example, ways for wildlife to safely cross over roads and paths.
Landscape and visual amenity	Retain and enhance existing landscape features	The Landscape Study recommends a number of mitigation measures to be implemented within the site which will have benefits for the wider area. In relation to compensation measures on land outside the allocation, the Study recognises the value of the mature beech trees on the land south of H72 which is also proposed to be released from the Green Belt but is not part of the allocation. The Study recommends that, subject to an arboricultural report confirming that the trees are healthy, these should be protected by a Tree Preservation Order to ensure they are retained.

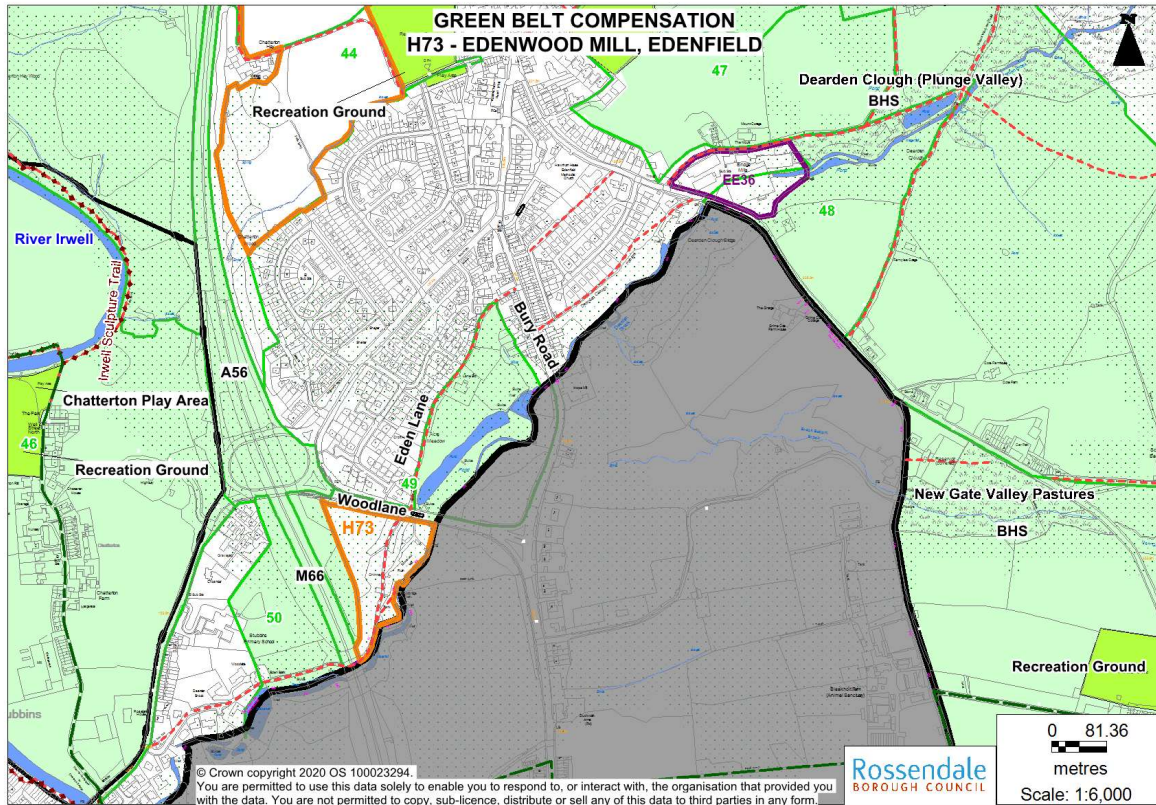
## H73 - Edenwood Mill



Green Belt Review findings:  
GB Parcel 49 (the allocation is a part of the wider parcel)  
High degree of harm  
Wider parcel not recommended for release

6.6 This largely brownfield allocation is to the far south of Edenfield and is comprised of the vacant Edenwood Mill building, associated parking and curtilage, along with additional greenfield land to the west. Following discussions at the Local Plan hearings, the car parking area along the south-eastern edge of the site is proposed to be included within the site boundary (the map above shows the boundary at the time of submission while the map below shows the proposed changes).

Potential compensatory measures:



**MAP KEY**

- Public Rights of Way**
- Rossendale Way
  - Pennine Bridleway
  - Irwell Sculpture Trail
  - Existing or Proposed Cycle Route
  - Other PROW

**Proposed Allocations**

- Mixed-use
- Housing
- Employment

**Green Belt**

- Green Belt (as shown on Submission Version of the Local Plan)
- Green Belt Parcels assessed in Green Belt Review
- Council Owned Land Relevant to Green Belt Compensation

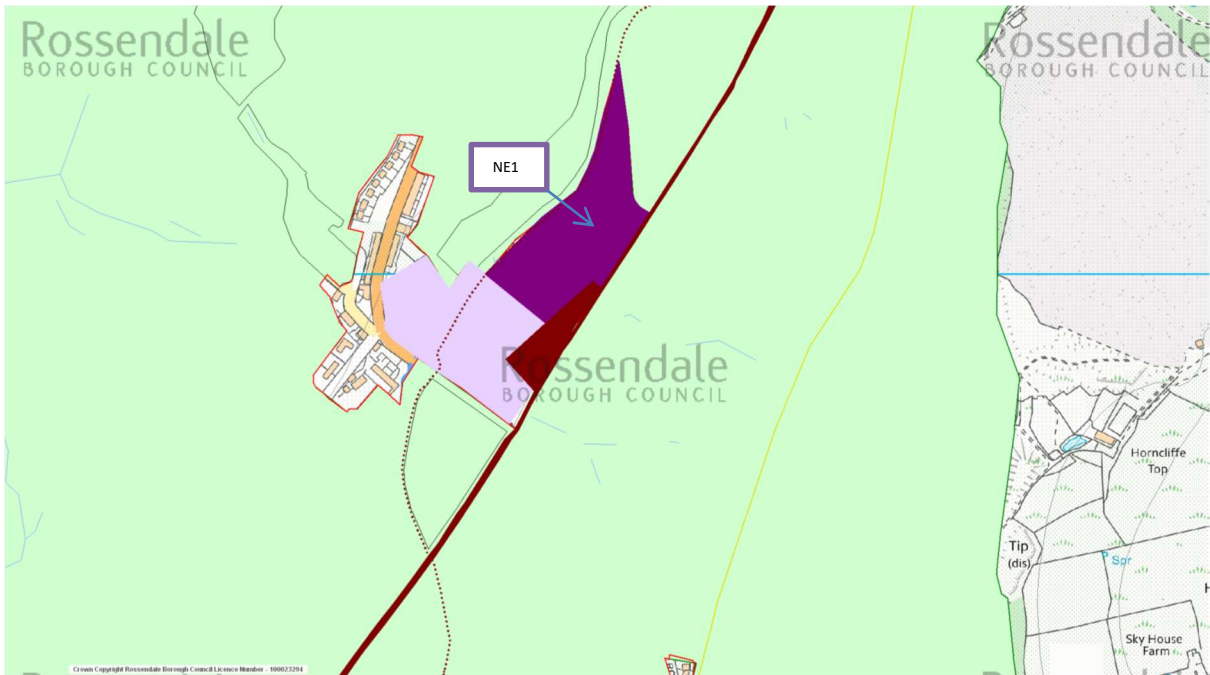
**Natural and Built Environment**

- Site of Special Scientific Interest (SSSI)
- Biological Heritage Site (BHS)
- Local Geodiversity Site (LGS)
- Important Wildlife Site (IWS)
- Green Infrastructure (including Greenlands and ecological network)
- Blue Infrastructure
- Open Space (including Greenlands and Recreation Areas)
- Accessible and Ancient Woodlands
- Conservation Area

Theme	Measure	Opportunities
Access	Enhance links to cycle way and PROW	An existing PROW runs through the site which links to the wider network in the surrounding Green Belt. There is also an existing footbridge which crosses the watercourse to paths beyond. These should be retained and enhanced as part of any development. Appropriate signage and information, for example route maps showing circular walks or links to the wider network and public transport, could be provided. The Landscape Study recommends that, in order to maximise the opportunity to enhance existing footpaths beyond the road bridge, a wooded route could be designed through the houses linking to these. A sensitive design should also be adopted to maintain the rural feel of existing footpaths within the site.
Sport and recreation	Enhance links to nearby recreation grounds	Direct access to the path network from the allocation should be retained and enhanced as part of any development. There are three recreation grounds between 500-1500m away at Chatterton, Edenfield and Turn and walking or cycling links to these through the remaining Green Belt should be explored.

Biodiversity and wildlife corridors	Enhance biodiversity corridors	<p>There are areas of woodland within and in close proximity to the site. Areas within the site should be retained as far as possible and enhanced as part of the development; opportunities to provide further tree planting, particularly if this would link with existing woodland to the north of the allocation (on the other side of Wood Lane) and linking to corridors beyond this could be explored. Opportunities to provide or enhance a continuous link for wildlife between the allocation and the wider trees/habitat could be explored. The Landscape Study recognises the value of the Green Belt area to the north of the allocation as an important wildlife corridor, linking Dearden Clough and the Irwell Valley. It suggests that a planning condition could be attached to any future development placing a covenant or similar on this area promoting the development of a local nature reserve with pedestrian access along newly created footpaths, managed by the local community. Watercourses within the site should be protected for their biodiversity value and enhanced as part of the development.</p>
Landscape and visual amenity	Retain and enhance existing landscape features	<p>Existing woodland within the site should be retained as far as possible and enhanced and maintained (particularly where it could link to existing woodland outside the site); this will help to enhance the visual quality of the development and provide other benefits such as noise attenuation. The Landscape Study states that the area to the north of the allocation provides an important visual resource for residential properties on Eden Lane and motorists and pedestrians on the A56 and Bury Road which overlook it. The study also states that the layout of any development should retain views to the opposite side of the valley, on approach to the M66 roundabout and the existing hedge which forms the A56 boundary should be retained and managed, ensuring gaps are filled. The 'mass' of built development could also be reduced by incorporating tree groups within the layout. The existing watercourse could be enhanced as an amenity feature within the site, where appropriate.</p>

## NE1 - Extension to Mayfield Chicks



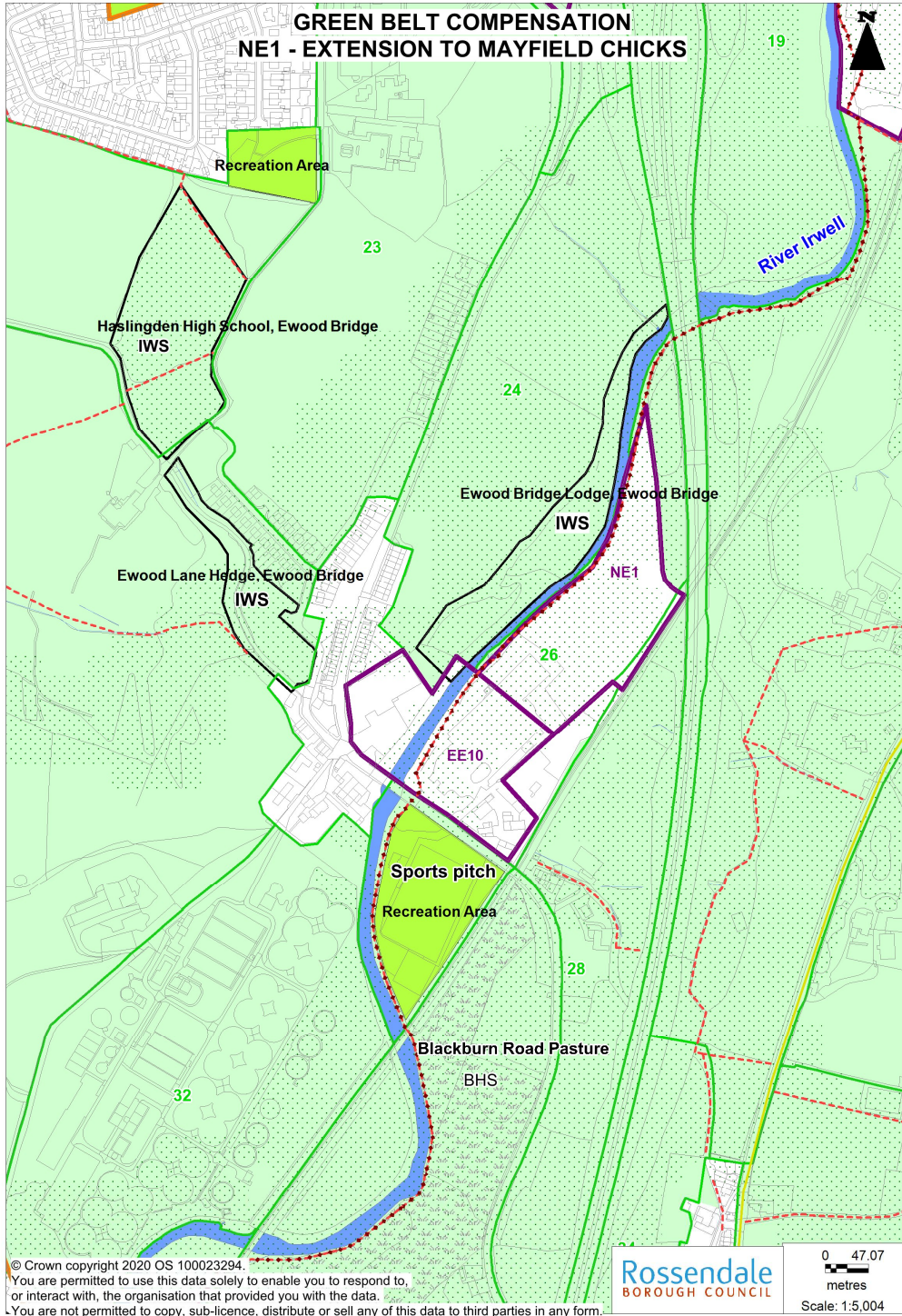
GB Parcel 26

Medium degree of harm

Potential for release

6.7 An existing employment area already exists to the south of this proposed greenfield Green Belt release. The Green Belt Study (Parcel 26) identifies that the parcel is suitable for release and would have defensible boundaries.

Potential compensatory measures:



**MAP KEY**

- Public Rights of Way**
- Rossendale Way
  - Pennine Bridleway
  - Inwell Sculpture Trail
  - Existing or Proposed Cycle Route
  - - - Other PROW

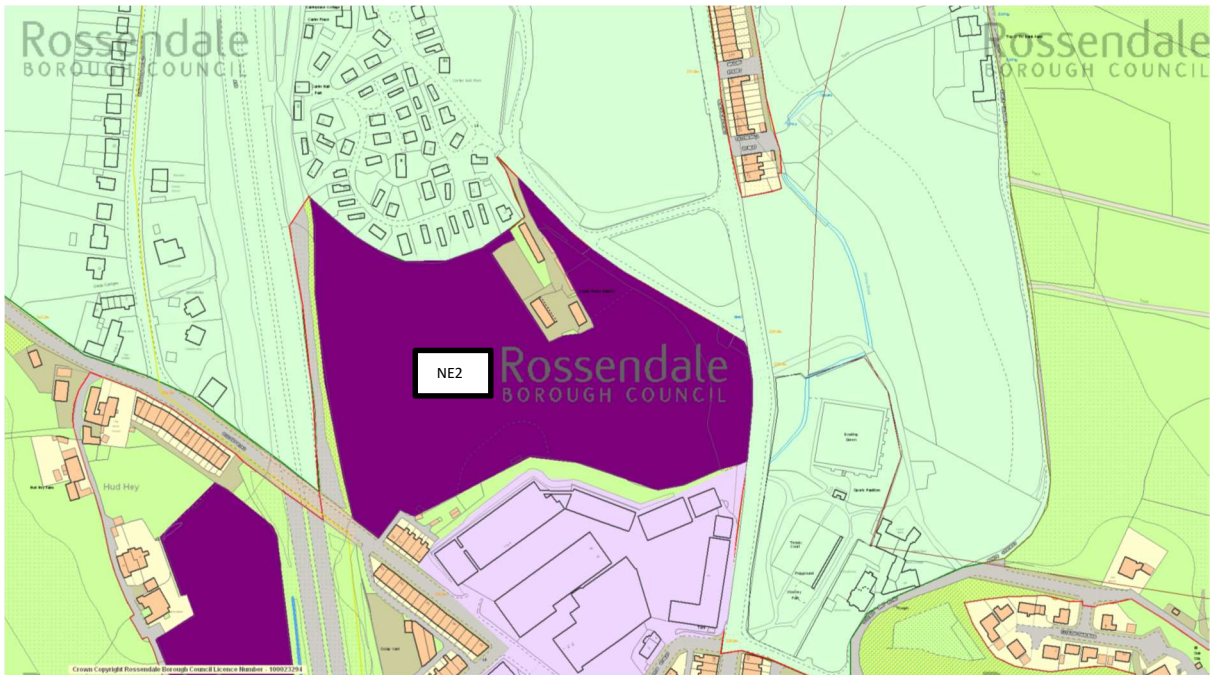
- Proposed Allocations**
- Mixed-use
  - Housing
  - Employment

- Green Belt**
- Green Belt (as shown on Submission Version of the Local Plan)
  - Green Belt Parcels assessed in Green Belt Review
  - Council Owned Land Relevant to Green Belt Compensation

- Natural and Built Environment**
- Site of Special Scientific Interest (SSSI)
  - Biological Heritage Site (BHS)
  - Local Geodiversity Site (LGS)
  - Important Wildlife Site (IWS)
  - Green Infrastructure (including Greenlands and ecological network)
  - Blue Infrastructure
  - Open Space (including Greenlands and Recreation Areas)
  - Accessible and Ancient Woodlands
  - Conservation Area

<b>Theme</b>	<b>Measure</b>	<b>Opportunities</b>
Access	Enhance links to cycle way and PRow	The existing PRow along the river should be retained and enhanced, particularly to strengthen links between the site and the wider Green Belt, including the access to the sports pitch which is in the Green Belt to the south (if this is to come back into recreational use). The possibility of creating a continuous footpath, possibly along the river, to access Rawtenstall could be explored; developer contributions could be sought for this.
Sport and recreation	Enhance links to nearby recreation grounds	The existing PRow along the river should be retained and enhanced, particularly to strengthen links between the site and the wider Green Belt, including the access to the sports pitch to the south (if this is to come back into recreational use). Developer contributions could be sought for enhancements to this sports pitch.
Biodiversity and wildlife corridors	Enhance biodiversity corridors	The areas closest to the river should be retained and kept open as a wildlife corridor, ensuring that enhancements are made to this within and beyond the site allocation, including to the existing woodland and the Important Wildlife Site to the opposite side of the river. Opportunities to provide further tree planting, particularly if this would link with existing woodland could be explored.
Landscape and visual amenity	Retain and enhance existing landscape features	The Landscape Study recommends a number of mitigation measures for development, which will have benefits for the wider area. These include: <ul style="list-style-type: none"> <li>• Restoring and strengthening existing hedges;</li> <li>• Developing a strong planting framework comprising of native species, making use of opportunities to link up with the existing woodland;</li> <li>• Screening planting should be established.</li> </ul>

## NE2 - Land north of Hud Hey



GB Parcel 10

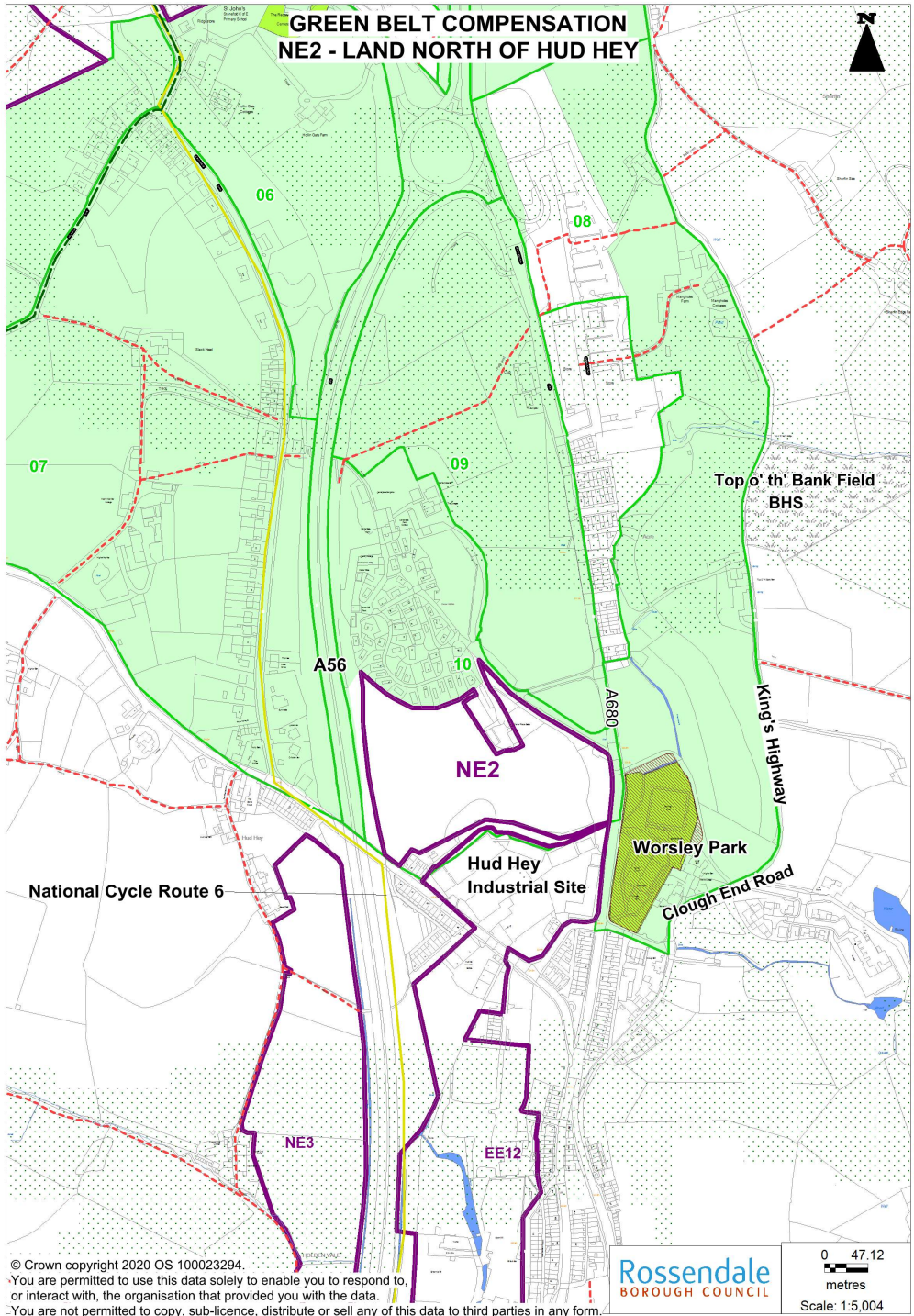
High degree of harm

Not recommended for release

6.8 Land north of Hud Hey is not recommended for release in the Green Belt Study (Parcel 10) because of its role in separating Haslingden and Rising Bridge. However, the Landscape Study identifies that the site could be suitable, with mitigation. Additionally, discussions with local developers indicate a strong interest in the site with its proximity to the A56 (T). There is also an overall shortage of suitable employment sites close to the A56.

Potential compensatory measures:





**MAP KEY**

- Public Rights of Way**
- Rossendale Way
  - Pennine Bridleway
  - Inwell Sculpture Trail
  - Existing or Proposed Cycle Route
  - Other PROW

**Proposed Allocations**

- Mixed-use
- Housing
- Employment

**Green Belt**

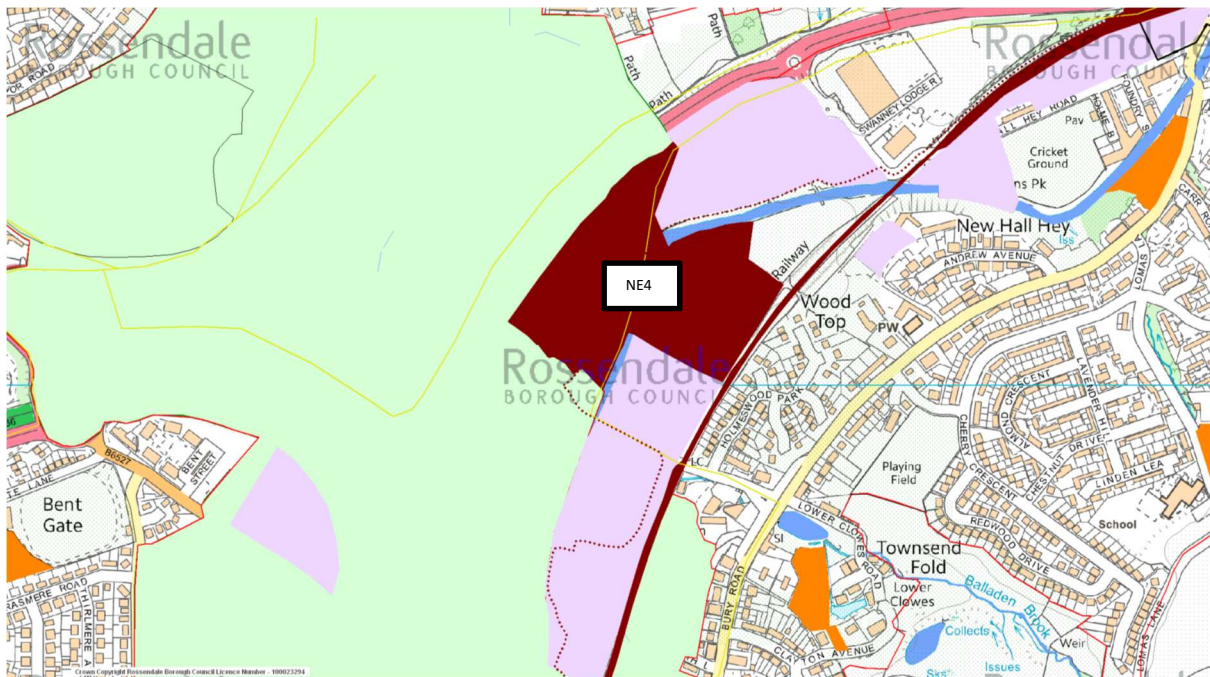
- Green Belt (as shown on Submission Version of the Local Plan)
- Green Belt Parcels assessed in Green Belt Review
- Council Owned Land Relevant to Green Belt Compensation

**Natural and Built Environment**

- Site of Special Scientific Interest (SSSI)
- Biological Heritage Site (BHS)
- Local Geodiversity Site (LGS)
- Important Wildlife Site (IWS)
- Green Infrastructure (including Greenlands and ecological network)
- Blue Infrastructure
- Open Space (including Greenlands and Recreation Areas)
- Accessible and Ancient Woodlands
- Conservation Area

<b>Theme</b>	<b>Measure</b>	<b>Opportunities</b>
Access	Enhance links to cycle way and PRow	The site is adjacent to Worsley Park (albeit on the other side of A680 Blackburn Road), which is in the remaining Green Belt and is owned by the Council. Opportunities to provide direct and safe access to this from the allocation should be explored. There are no existing PRow in or around the site but, as well as links to Worsley Park, other new links could be explored, particularly to woodland in the wider Green Belt to the east and linking with PRow to the other side of King's Highway. Improvements to the national cycling route 6 could be considered to enhance the link between Haslingden and Rising Bridge.
Sport and recreation	Enhance links to nearby recreation grounds	Developer contributions to enhance Worsley Park should be sought, including to the existing bowling green, tennis courts and play area.
Biodiversity and wildlife corridors	Enhance biodiversity corridors	Opportunities to provide additional tree planting and habitat creation within the site should be explored. Any existing woodland within the site, particularly along the A56, A680 and between any new development and existing housing to the north should be retained, maintained and enhanced for its biodiversity value. Contributions to enhance areas of biodiversity beyond the site, within the wider Green Belt, should also be explored, for example within any natural areas of Worsley Park, the woodland to the north and east of the park and to the south of Clough End Road. Opportunities to create or enhance safe wildlife corridors between these areas could be explored.
Landscape and visual amenity	Retain and enhance existing landscape features	The Landscape Study recommends the following mitigation measures for development: <ul style="list-style-type: none"> <li>• Protection of existing trees with and along the boundary, including to act as screening between any new development and housing to the north (particularly if new development is industrial);</li> <li>• Incorporate tree planting within the site which will filter views through the site while not blocking them;</li> <li>• Establish a strong belt of trees, reinforcing what is there, along the southern boundary adjacent to Hud Hey Industrial Site.</li> </ul>

## NE4 - Extension of New Hall Hey



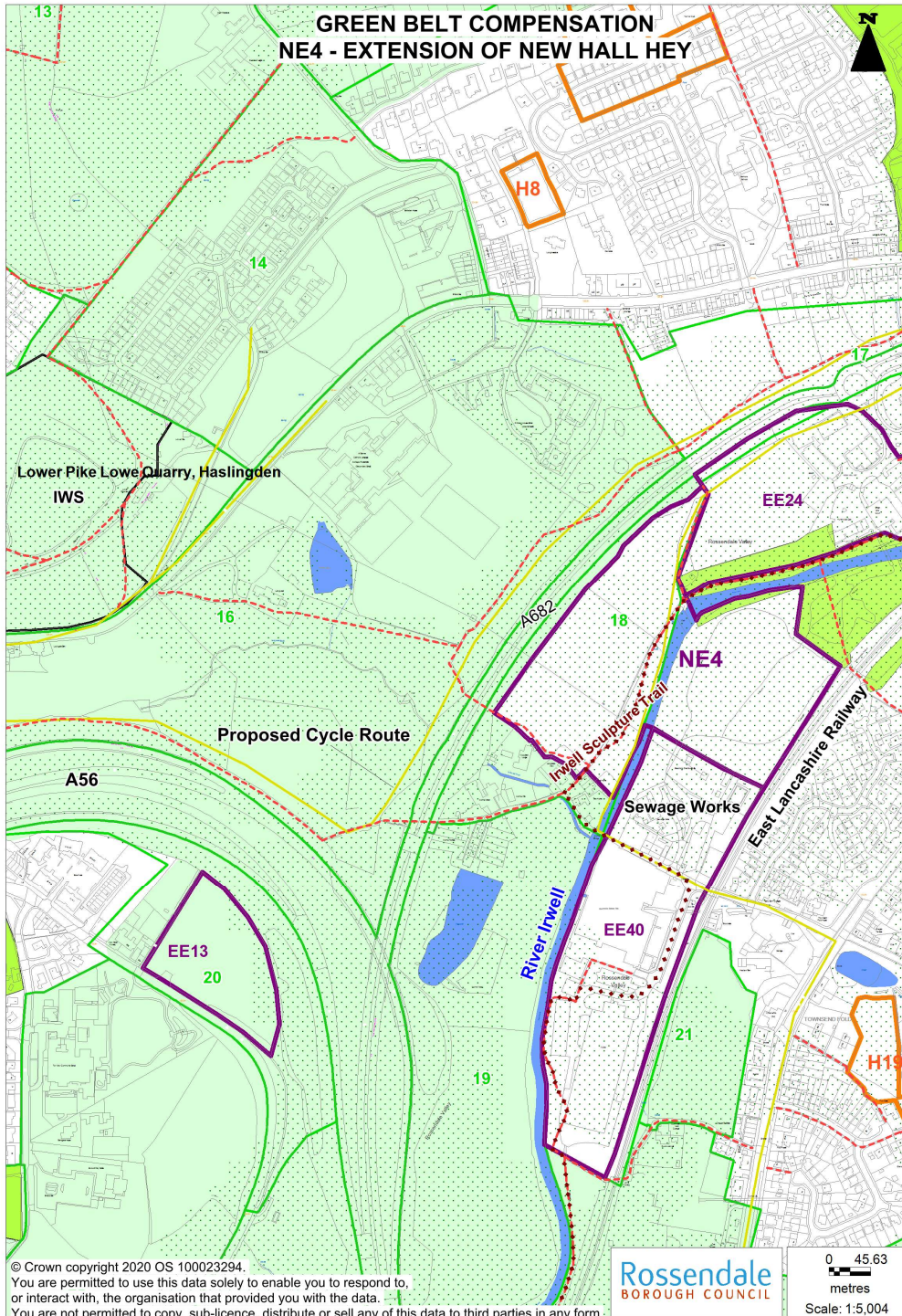
GB Parcel 18

High degree of harm

Not recommended for release

6.9 The land at New Hall Hey west of the river (the east side of the river is not Green Belt) is not recommended for release in the Green Belt Study (Parcel 18) and this part is also not supported by the Landscape Study. This is considered to be outweighed by the need to provide suitable employment land close to the A682 and A56 corridor acting as a Gateway site to Rossendale's town of Rawtenstall.

**Potential compensatory measures:**



**MAP KEY**

**Public Rights of Way**

- Rossendale Way
- Pennine Bridleway
- Inwell Sculpture Trail
- Existing or Proposed Cycle Route
- Other PROW

**Proposed Allocations**

- Mixed-use
- Housing
- Employment

**Green Belt**

- Green Belt (as shown on Submission Version of the Local Plan)
- Green Belt Parcels assessed in Green Belt Review
- Council Owned Land Relevant to Green Belt Compensation

**Natural and Built Environment**

- Site of Special Scientific Interest (SSSI)
- Biological Heritage Site (BHS)
- Local Geodiversity Site (LGS)
- Important Wildlife Site (IWS)
- Green Infrastructure (including Greenlands and ecological network)
- Blue Infrastructure
- Open Space (including Greenlands and Recreation Areas)
- Accessible and Ancient Woodlands
- Conservation Area

<b>Theme</b>	<b>Measure</b>	<b>Opportunities</b>
Access	Enhance links to cycle way and PRoW	The existing PRoW along the river should be retained and enhanced, particularly to strengthen links between the site and the wider Green Belt. This could include additional planting along the routes, particularly to screen the new development. Opportunities to create a continuous footpath link along the river should be explored, particularly to connect with the riverside walk to the south of the site, as well as creating or enhancing existing paths following the river to the east of the allocation. Enhancements to the PRoW and other paths through the existing Greenlands/green infrastructure to the east could also be sought; this should include ensuring there are direct links from the allocation to this area on foot. Contributions to the proposed cycle routes to the South of Rawtenstall could be considered to improve the accessibility of these employment areas and link to the wider Green Belt to the south.
Sport and recreation	Enhance links to nearby recreation grounds	For the area to the east of the River Irwell, the Landscape Study recommended the following mitigation measures: <ul style="list-style-type: none"> <li>• Creation of a new area of public open space alongside the East Lancashire Railway - if done sensitively this could have a positive impact locally.</li> </ul> Although not within the Green Belt, this could include developer contributions for enhancements to recreational use of the existing Greenlands/ green infrastructure to the north east of the site and to providing direct links to this from the allocation.
Biodiversity and wildlife corridors	Enhance biodiversity corridors	The areas closest to the river should be retained and kept open as a wildlife corridor, ensuring that enhancements are made to this within and beyond the site allocation, for example to the woodland to the south of the site adjacent to the sewage works and to the green infrastructure to the east and north of the allocation. The biodiversity value of the River Irwell could be enhanced through developer contributions.
Landscape and visual amenity	Retain and enhance existing landscape features	For the area to the east of the River Irwell, the Landscape Study recommended the following mitigation measures: <ul style="list-style-type: none"> <li>• Creation of a new area of public open space alongside the East Lancashire Railway - if done sensitively this could have a positive impact locally;</li> <li>• New layout should accommodate long views east west across the site, and avoid screening off the railway;</li> <li>• Planting to the south east of the site should screen out the unsightly substation;</li> <li>• Protection and retention of existing trees bounding the site, ensuring robust tree protection measures are used during site works.</li> </ul> Existing trees and woodland within the site should be retained as far as possible and enhanced where possible (particularly where it could link to existing woodland outside the site); this will help to enhance the visual quality of the development and screen new buildings. The visual amenity benefits of the riverside location should be enhanced as far as possible to make a landscape feature of the river.

## **7 Conclusion**

7.1 All of the compensatory improvements suggested as part of the report could be delivered through the usual planning mechanisms, such as conditions or Section 106 Agreements. One of the off-site improvement and compensation is located on land which is owned by the local authority, in existing recreation use, so improvements should be straightforward.

7.2 The Council considers that the approach taken in the plan accords with the guidance set out in the PPG and as such is justified and effective in its ability to deliver compensatory Green Belt improvements. As stated in the introduction, the Council will collaborate with other bodies which will help to identify and secure potential schemes and mechanisms for funding.

## **Appendix 1 – Consultation with landowners and developers**

### **1. Introduction**

1.1 The Council prepared a note setting out a range of compensation measures for site allocations which would involve Green Belt releases. The note was submitted to the Inspectors on 1<sup>st</sup> June 2020 and following feedbacks, the Council emailed landowners and developers of the affected site allocations to seek their views. This note provides a summary of the comments received which can also be found in Appendix A.

### **2. Comments received**

2.1 An email was sent to landowners and developers of the relevant site allocations on 4<sup>th</sup> August 2020 asking for their comments within a 2 week period. Two responses were received from Planning Agents representing landowners and developers for site allocations H72 – Land West of Market Street, Edenfield and H73 – Edenwood Mill, Edenfield.

#### H73 – Edenwood Mill, Edenfield

2.2 No issues or concerns were raised regarding the compensatory measures for this site. Some issues were raised regarding the site boundary of the proposed allocation. The landowner would like to include a parcel of land to the north east of the site, beyond Wood Lane, which is not currently proposed for allocation. More information on this parcel can be found in the notes for Action 8.1 (Omitted Sites) and Action 8.7 (Rejected Sites). Also, the site boundary did not include the car park area located along the south-eastern boundary of the site, though it was agreed at the Local Plan hearings that this area should be included in the allocation. Following this latter comment, the map showing the site allocation and Green Belt compensatory measures has been updated to include the car park area.

#### H72 – Land West of Market Street, Edenfield

2.3 Issues were raised regarding the lack of information in terms of the costs involved to deliver the proposed compensation measures and the fact that the Open Space Study and Playing Pitch Assessment have not yet been published.

2.4 Despite this, there is support regarding the enhancement of links to the cycle way and PRow as well as to nearby recreation facilities. Regarding biodiversity and wildlife corridor, the developer proposes to retain and enhance tree cover within the site, however no commitments to improve the Ancient Woodland at Great Hey Clough or nearby Biological Heritage Sites are made as the developer argues this should be costed as part of a Viability Assessment and subject to the test of Section 106 Agreement (measures should be related to the development and necessary to mitigate the impacts of the development). The mitigations set out in the Landscape Study carried out by Penny Bennett on behalf of the Council are disputed by the developer who has commissioned their own landscape study.

2.5 Overall, Pegasus supports the Green Belt compensatory measures identified in national guidance and welcomes the fact that the Council aims to direct them to land adjoining the proposed allocation. However, Pegasus reserves the rights to provide further comments once the Open Space Study is published and costs of the proposed measures have been considered. They also raise a point in relation to working in collaboration with adjoining landowners to deliver the proposed Green Belt improvements.

### **3. Conclusion**

3.1 Following consultation with landowners and developers on the proposed Green Belt compensation measures, 2 responses were received. These were generally supportive of the measures proposed, especially as they focus on neighbouring land to the proposed site allocations. However, a developer reserves the right to provide further comments once the Open Space Study has been published and costs of the Green Belt compensation measures have been considered. Also, the need to work in collaboration with adjoining landowners to obtain access and permission for the proposed measures has been highlighted.



## Appendix A – Comments Received

Roman Summer Associates Ltd on behalf of the landowner of H73 – Edenwood Mill,.....1  
Edenfield

Pegasus on behalf of Taylor Wimpey, landowner of part of H72 – Land West of .....4  
Market Street, Edenfield

**From:** [REDACTED]@romansummer.com>  
**Sent:** 09 August 2020 23:24  
**To:** Anne Storah  
**Cc:** Nathaele Davies; Storm Grimshaw; Tony Blackburn; Michael Atherton  
**Subject:** Re: Rossendale Local Plan - Proposed Green Belt compensatory measures

Dear Anne

I have shared the document entitled '*Compensation Measures for Green Belt Release*' with the joint owners of site H73, and I am pleased to confirm that they agree / take no issue with the range of potential compensatory measures set out on pages 18 and 19.

The only (ongoing) concern of my clients is the omission of the parcel of land to north east, which remains a point of objection from my clients (for reasons explained in our previous representations). In the event that that parcel of land was included in the allocation, the same range of compensatory measures could of course be extended to cover that land also.

The only other point we would wish to raise at this stage is that the orange shading of site H73 (on page 17 of your document) omits the small former car park area. I believe that the Council has already agreed that that small plot of land ought to be included within the designation, and so should ideally be included within the orange shading in your 'Compensation' document.

Thank you for allowing us an opportunity to comment on the draft document.

Regards

Richard

Richard Gee **Director**

**Roman Summer Associates Ltd**

Haweswater House, Waterfold Business Park,

Bury, Lancashire, BL9 7BR

Telephone: 01706 829 592

[REDACTED]@romansummer.com [www.romansummer.com](http://www.romansummer.com)



On 4 Aug 2020, at 17:20, Anne Storah <[AnneStorah@rossendalebc.gov.uk](mailto:AnneStorah@rossendalebc.gov.uk)> wrote:

Dear all,

As you may recall the Inspector has requested that the Council considers how the measures introduced in [paragraph 138 of the National Planning Policy Framework](#) for Green Belt compensation can be addressed in the emerging Local Plan (Action 8.10). In this regard we have

considered [Paragraph: 002, Reference ID: 64-002-20190722 \(22 July 2019\) of the Planning Practice Guidance](#).

The Council has drafted the attached document and is seeking your comments on the proposals that are being suggested. It would be appreciated if we could have your comments by Monday 17 August – please let me know if that is not possible.

This email is being circulated to all agents / landowners in respect of land that is in the Green Belt but proposed for release and which would be affected by these Greenbelt Compensatory Measures.

As you may have noticed some documents have already been uploaded to the Examination webpage and an update will be issued soon. The Council is continuing to work on completing the Actions and I apologise for the delay to the timetable.

Please contact me if you require more information or clarification on this email.

Kind regards,

Anne

Anne Stora  
Principal Planner (Forward Planning)  
Rossendale Borough Council

Direct dial: 01706 252418

Rossendale Borough Council  
Room 120  
The Business Centre  
Futures Park,  
Bacup,  
OL13 0BB.

Web: [www.rossendale.gov.uk](http://www.rossendale.gov.uk)

Twitter: [@RossendaleBC](https://twitter.com/RossendaleBC)

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Visit Rossendale: <http://www.visitrossendale.com/>

Local Plan: [www.rossendale.gov.uk/localplan](http://www.rossendale.gov.uk/localplan)

<image001.png>

<image002.png>

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## Disclaimer

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Website Address: [www.rossendale.gov.uk](http://www.rossendale.gov.uk)  
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Telephone 01706 217777

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<Action 8.10 Compensatory Measures for Green Belt Release - 01.06.20.pdf>

21<sup>st</sup> August 2020

Anne Storah  
Principal Planner (Forward Planning)  
Rossendale Borough Council  
Room 120  
The Business Centre  
Futures Park  
Bacup,  
OL13 0BB

***Sent by email***

Dear Anne,

**Proposed Compensation Measures for Green Belt Release (Action 8.10 – 4<sup>th</sup> August 2020)  
Taylor Wimpey Comments (in relation to Edenfield Allocation H72)**

We are writing with comments on the Council's 'Proposed Compensation Measures for Green Belt Release' document on behalf of Taylor Wimpey in respect of their land interests within Allocations H72. This document comprises action 8.10 from the 'Schedule of Actions' agreed between the Inspector and Council after last year's EiP (Ref: EL6.001) and was issued on 4<sup>th</sup> August 2020 for comment from developers.

**Missing / Incomplete Evidence**

At the outset it is noted that this paper does not address action 8.11 in terms of including the costs of the proposed compensation measures in the Viability Assessment (as confirmed on page 1). Without an understanding of the viability implications, it is impossible to provide a comprehensive response on this matter or a firm commitment to any of the measures set out, and this is particularly relevant in Rossendale given the well-known viability issues across the borough.

The same is true with the emerging Open Space/ Playing Pitch Assessment which has yet to be published, as this is a key supporting evidence document, given that it "*will audit the quantity, quality and accessibility of all existing open spaces and other sport and recreation facilities and provide recommendations on provision standards, opportunities for enhancement and future investment priorities.*" Therefore we need sight of this document to know the existing situation with the Borough's open spaces and where the opportunities for enhancement are. This is particularly relevant given the last published Open Space Review dates back to 2005 and the Open Space Strategy to 2008 (paras 5.4 - 5.6).

As such we reserve the right to make further comments once the updated Viability and Open Space Assessments are available.

**National Policy Context / Overall Approach**

We agree that the relevant national policy and guidance in respect of this matter is that set out in paragraphs 138 and 141 of the 2019 NPPF; and part 64 paragraphs 2 and 3 of the PPG (Refs: 64-002-20190722 & 64-003-20190722), and this is set out below for clarity:

*138. "...They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."*

141. "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

**"How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements?"**

Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision."

Paragraph: 002 Reference ID: 64-002-20190722

**"How can the strategic policy-making authority ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured?"**

Identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:

- land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;
- the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability;
- the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites."

Paragraph: 003 Reference ID: 64-003-20190722

We also agree that the compensatory measures proposed should focus on Green Belt land adjacent to or in close proximity to the sites proposed for release (as noted in paragraphs 3.1 and 6.1), as whilst this is not specifically stated in national guidance, it will help demonstrate that any improvements and associated financial contributions are directly related to the development to satisfy the CIL tests.

Proximity to allocated sites will also give such improvements the best chance of being delivered and used/ enjoyed by new and existing communities, as they will be more visible, with fewer barriers and constraints to deal with (in terms of land ownership, access, maintenance etc) which would obviously increase with distance.

**Proposed Compensatory Measures at Allocation H72 – Market Street Edenfield**

We now comment on the measures proposed for Allocation H72, West of Market Street, Edenfield, with particular focus on Taylor Wimpey’s landholding in the centre of the allocation.

We deal with each of the themes and proposed measures in turn, with reference to our Matter 14 Hearing Statement (**Ref: EL2.067F**) relating to this site and the latest concept Masterplan for the allocation (Appendix 2), an extract of which is provided below for clarity:



***Access - Enhance links to cycle way and PRow***

We fully support the enhancement the existing footpath network and keep links to the wider network free from our obstruction. As set out in our Hearing Statement (paragraphs 5.7 & 5.8) we consider this the most obvious and deliverable improvement this site can make to the wider Green Belt, and have already offered potential enhancements including improving visibility from the main road and providing signposting/ information boards within the site as required.

In relation to a new area of public open space being created in the south of the site, it is unclear where this is identified within the Landscape Study (which we understand to be document **EB025** and associated appendices from the Examination Library); however I note that the concept masterplan already proposes open space in this area, and footpath links with Woodland Road as suggested.

***Sport and Recreation - Enhance links to nearby recreation grounds:***

We fully support the enhancement of links to nearby recreation facilities, with the concept masterplan showing direct connections to the existing recreation ground in the south, with opportunities to enhance the existing PROW links to the cricket ground to the south east and Chatterton play area to the south west (through signposting/ information/ maps as above).

Any on site provision or associated off-site contributions would need to be supported by detailed costing information such that they can be factored into the Viability Assessment and would also need to be fully justified in line with CIL tests, and this another reason why an up to date Open Space Assessment is so important. If third party land is involved, the Council will need to ensure the relevant permission or access rights are secured from the landowner, as well as the legal basis for any contribution payments.

***Biodiversity and Wildlife corridors - Enhance biodiversity corridors:***

The concept masterplan demonstrates that all existing woodland the site will be retained and enhanced with additional planting, which will provide an enhanced biodiversity corridor to the west of site, linking the woodland around Church Lane with Chatterton Hey. Any existing watercourses requiring protection will be identified through the Ecological survey process and managed through an agree strategy.

In respect of any contributions to the Ancient Woodland at Great Hey Clough this would need to be supported by detailed costing information such that it can be factored into the Viability Assessment. It would also need to be fully justified in line with CIL tests (particularly whether it is directly related to the development or necessary to make it acceptable in planning terms), which could require the detailed early engagement with GMEU or Natural England.

Again, if third party land is involved, as we understand it is, the Council would need to secure the relevant access rights/ legal agreements.

***Landscape and visual amenity - Retain and enhance existing landscape features:***

It is pertinent that our Hearing Statement (Question a - paras 2.1 – 2.5 & Appendix 3) includes a detailed Landscape Assessment prepared by Randall Thorp, which disputes several of the findings raised in the Council's Landscape Study, and this Assessment has been endorsed by Council Officers through the EiP process and informed the Concept Masterplan.

As such, we can confirm that the landscape design principles set out by Randall Thorp will be incorporated into the scheme with existing valued features retained wherever possible.



In respect of the Beech Trees to the south of the site, these are outside TW's ownership, however it is unclear where the justification for applying a TPO comes from, as the Council's Landscape Study (EB025) simply requests that robust tree protection measures are used during site works, which is a standard requirement that would generally be secured via condition. It is worth noting that these trees are shown as being retained on the concept masterplan anyway with a large stand-off of open space between them and the proposed development envelope.

## **Conclusions**

Taylor Wimpey fully support the Council's aspiration to provide compensatory improvements to Green Belt, in line with national guidance, and welcome the focus on land directly adjacent to site's proposed for release, as this maximises the chances of these improvements being delivered and the potential benefit to the community.

We have provided initial comments on the different measures outlined, however overall it is our view that this matter cannot be robustly addressed until the updated Open Space and Viability Assessments have been published, so we can understand the actual opportunities for enhancement, detailed costings of any proposed improvements, and the viability implications of these.

The Council will also need to provide further evidence in respect of land ownership and securing the relevant access rights and permissions.

Without this information we are unable to commit to any of the contributions set out, as they will simply not be able to satisfy the CIL tests.

As such we reserve the right to make further comments once these updated evidence base documents are published.

I trust the above representations are clear, but should you or the Inspector require any clarification or further information please make contact on the details below.

Yours sincerely,



Graham Lamb  
**Director**

