

Edenwood Mill (2020/0013) – Binder 1

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ROMAN SUMMER



Dear Sir / Madam

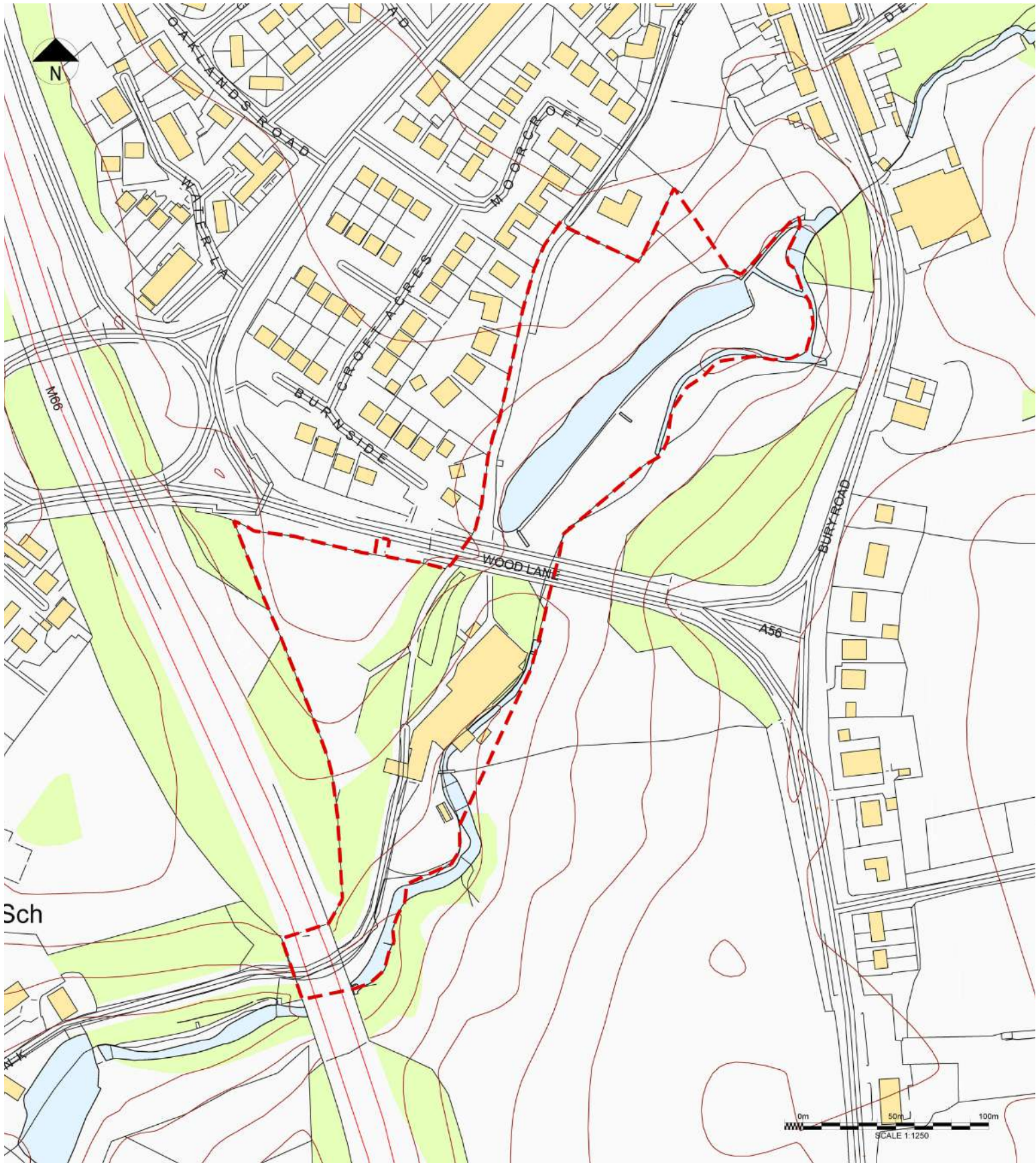
**REQUEST FOR PRE-APPLICATION COMMENTS
PROPOSED LOCAL PLAN ALLOCATION H73 AND LAND TO NORTH
EDENWOOD MILL AND ADJOINING LAND, OFF WOOD LANE, EDENFIELD, BL0 0EX**

We are instructed jointly by landowners *Turnbull & Stockdale and Liz Faulkner / Graham Moxon / Ruth Taylor* to request a pre-application ‘virtual’ meeting / conference call (as a result of Coronavirus) to discuss the proposed demolition of Edenwood Mill and the erection of up to 66 dwellings on the above land, via a replacement access from Wood Lane (A56).





The full extent of our joint clients' land is identified by the red boundary on the plan below.





The Council is aware that *Turnbull and Stockdale* own Edenwood Mill and its associated land to the north, which has been unused for approaching three decades, is surplus to requirements, not fit for purpose and is in derelict, deteriorating and dangerous condition. Theft of roofing lead, slates, structural columns and everything else of perceived value, and multiple arson attacks and fires, have accelerated that process and proven impossible to halt.

While its walls are largely intact, those are seriously buckling and much of the roof has collapsed. This is confirmed in the accompanying Structural Report prepared by Michael Pooler Ltd, which concludes :

'I consider the viability of conversion and retention of the current industrial complex for the domestic housing market to be unrealistic, not only for the Architectural challenges to the existing format but also for the extensive issues of health and safety within the works as a whole. Upgrading and repairing the existing structural layout for today's housing markets would be considerable, and I consider that the costs for any attempted conversion would be excessive and uneconomical in today's climate.'

The triangular parcel of land accessed via Wood Lane is jointly owned by a family consortium comprising Liz Faulkner, Graham Moxon and Ruth Taylor. Land registry ownership details for this parcel of land are provided at *Annex A* of this letter, and such details for the Turnbull land are provided at *Appendix 1* of the separate Viability / Marketing Report prepared by Nolan Redshaw.

The land off Wood Lane is an unused field of nondescript character, which slopes down towards the Mill at the bottom of the valley. It is served by an existing vehicular access, albeit it is accepted that, to provide suitable access to serve a future housing development, an alternative / wider access would need to be constructed.

All landowners have reached agreement to promote the land jointly, and to see it developed for housing within the next 3 to 5 years. There has been considerable interest in the land from reputable housebuilders (see evidence in Nolan Redshaw report). This part of Lancashire is extremely attractive to the market, with good land values / house prices and with excellent access to the motorway network.

That said, and given their obvious commitment to push this site forward through the Local Plan process, the landowners cannot understand why the Council has taken the decision to identify the site as a year 6 to 10 site. There is no clear logic or rationale to that judgement. It is an incorrect judgement and the landowners will continue to make protestations to the LP Inspector that the site ought to be moved forward as an early delivery site (years 1 to 5).

Local Plan Inspector's Questions

The LP Inspector has identified '*a number of deficiencies in the Council's evidence base*' and has requested the Council to undertake additional Sustainability Appraisal work and produce evidence on both strategic and site-specific matters.



The Inspector has posed the following ‘strategic’ questions to the LPA :

| | | |
|-----|---|--------|
| 8.3 | Check how the density of sites was identified and if this is net or gross (with particular reference to comments on density provided in Hearing Statements) | ✓ |
| 8.4 | Provide additional evidence to show how the Council optimised density on sites, with reference to policy HS7 and the list of allocated sites | ✓ |
| 8.5 | Sensitivity check the removal of Purpose 4 from the Green Belt study and see whether this makes a difference to the outcome of the assessment | ✓ |
| 8.6 | Provide evidence for all Green Belt (GB) parcels which were recommended for release in the GB study and the reasons why some were not fully assessed for potential development | ✓ ✓ |
| 8.7 | Produce clearer site selection evidence which clarifies why there are differences between SHLAA results and final conclusions on sites and provides clearer reasons for the overall conclusions (relating to rejected options). This should include setting out the assessment process for every potential GB site which was assessed for development and how the Council reached the conclusions on suitability and reasons for selection or rejection; within this need to explain why for some small GB site options it was deemed that harm to GB was not outweighed by the need to deliver identified development needs. | ✓ ✓ |
| 8.8 | Council to reflect on proposed GB boundary amendment GB(Maior)1 and | ✓ |

The Inspector has also raised the following questions specific to the Edenwood Mill allocation :

| Action Ref. No. | Action | Expected timescale | | Exam. Doc. Ref. No. | Comments |
|-----------------|---|--------------------|--------------|---------------------|--|
| | | Start | Month Ending | | |
| 14.4 | H73 – Edenwood Mill, Edenfield: i. Consider whether Highways England require specific wording for the slip road ii. Undertake a further Green Belt Assessment for the site iii. Amend boundary to include car park | | | | Consult Highways England LUC consultants to provide GB assessment |

In early March 2020, we approached the LP Inspector (via the Programme Officer) noting that it was the landowners’ intention to provide additional information in response to the above questions and on other matters of note and importance. For example, while it does form a question above, Inspector Child raised a specific verbal question at the EiP in respect of the possibility of Edenwood Mill being retained as part of a wider development scheme. This (and other) matters are addressed in these additional representations.

On 13th March 2020, the Inspector confirmed (via the Programme Officer) that :

‘The proposed additional information is noted and I can confirm that, in principle, I am likely to be amenable to accepting it. There is, however, some overlap with the post-hearing work that I have requested from the Council – particularly with regard to Green Belt / landscape assessment and whether exceptional circumstances exist based on securing retention of the heritage asset (mill buildings) through enabling development on the rest of the site. I would urge you to work closely with the Council on Green Belt, heritage and viability matters – and the Local Highways Authority



and Highways England on access and transport issues. Given the extent of the proposed evidence it is likely that I would allow an opportunity for the Council and other parties to comment on the documents once they are available. I would hope to be able to achieve this via written responses.'

Planning History

Planning permission was granted for residential conversion of the Mill on 15 February 2007 (ref. 2004/513). That application promoted the extension, alteration and conversion of the Mill to form 25 apartments, including the formation of passing bays along Edenwood Lane (along which the development was proposed to be accessed). However, the permission proved to be flawed and unworkable in that the following condition was imposed, which effectively prohibited the entire ground floor of the Mill being used for residential accommodation :

| | |
|------------------------------------|--|
| 12 | Notwithstanding the details given on the approved plans, and unless otherwise agreed in writing by the Local Planning Authority, no dwellings shall be formed at ground floor level within the building. |
| Reason for this condition : | To minimise the risk of flooding to future occupiers of the apartments, in accordance with policy DC.1 of the Rossendale District Local Plan and the requirements of PPG25. |

That condition had a catastrophic effect on the attractiveness and viability of the permission (refer to separate report by Nolan Redshaw as evidence).

The site was marketed at the time (again see Nolan Redshaw report), but attracted no interest once potentially interested parties appreciated the very poor condition of the building, the costs involved in its repair and refurbishment, the difficulties in providing access along a somewhat tortuous route via Edenwood Lane, compared with the limited end value of only 25 units and the market feedback that there was no real demand for apartments in Edenfield.

Realistically, as evidenced above and in the separate reports accompanying these representations, the former mill is now well beyond restoration and would require a very considerable amount of cross subsidy to render it remotely viable - far more land, development and cross subsidy than is available to our joint clients.

SHLAA 2018

While we appreciate that the purpose of the SHLAA is not to allocate sites, it is worth highlighting that Edenwood Mill is included as a potential site for housing development in the SHLAA (see extracts at *Annex A*).



The site scores well in the SHLAA, as it is previously developed, adjoining Edenfield's settlement boundary. Notably, the assessment confirms that any landscape impacts will be 'low' (we agree). The assessment also explains that :

"The site is also identified as a Woodland Stepping Stone Habitat and therefore the area available for development has been reduced by 50% to allow protection of the habitat. It is considered that the site can become suitable in the medium term subject to the access being improved, the woodland habitat being preserved and if it is demonstrated that there are no flood risk issues to the proposed residential units."

Here we wish to raise (again) the suggested 'Delivery Timeframe' of 6 – 10 years. Our clients are concerned that this site – which accommodates a rapidly deteriorating and dangerous structure – has been presented as a 6 – 10 year site. The reality is that, if the site is ultimately allocated, the marketing campaign (which has already attracted serious interest) will be refreshed and pursued with increased vigour (to reflect the fact that it will then be a very 'real' allocation as opposed to a 'hope' allocation) and our clients (informed by Nolan Redshaw as arguably the leading commercial agent in this part of the UK) see no good reason why all 66 (or so) dwellings will not have been built out within the first 3 – 5 years of the Plan period. All landowners are very willing and very keen to bring forward their land. There are no landownership issues to contend with or any unduly complex or sensitive matters to resolve. Any application will of course need to be supported by the correct information, but that is common to each and every allocation site.

We therefore request – again – both the Council and the LP Inspector to identify the entirety of our clients' landholdings as a Year 1 to 5 site.

Drainage Considerations

In view of Edenwood Mill's somewhat 'awkward' planning history (see earlier overview), our clients have appointed Betts Hydro to consider that history and provide preliminary advice on the topic of flood risk and drainage.

The attached *Flood Risk Scoping and Sustainable Drainage Statement* contains quite detailed analysis, but it ultimately confirms that the potential flood risks are very low and can be sufficiently catered for through the implementation of mitigation measures, including appropriate spatial planning within the ultimate layout. It also suggests that the incorporation of a sustainable and appropriate surface water and foul water management regime for any future development can also be achieved in accordance with planning policy.

While there will inevitably be further detailed drainage-related work in due course, that is common with all major planning applications, and we hope that the enclosed Statement by Betts Hydro provides both the LPA and the LP Inspector with sufficient comfort that flood risk and drainage do not present a serious impediment to the land coming forward, and are technical matters can and will be duly dealt with.



Heritage Considerations

Edenwood Mill is not listed and it does not appear on any 'local list'. Nor is it in or close to a Conservation Area. However, the Mill is considered to be a non-designated heritage asset, and, that said, it is important to be mindful of NPPF §197, which states that :

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

And also §198 which states :

'Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.'

This letter is accompanied by a *Heritage Briefing Report* prepared by Graeme Ives Heritage.

Prior to establishing his independent consultancy, Mr. Ives worked between 2006 – 2015 with English Heritage (now Historic England), and between 2012-15 he operated as Principal Inspector and Leader of its North West Development Management Team.

In his report, Mr. Ives confirms his agreement that Edenwood Mill is a non-designated heritage asset. He notes that the mill has been subject to deterioration, which has resulted in the loss of elements such as parts of the roof structure. He also notes that part of the elevation facing the stream shows signs of structural instability. He suggests that the ground floor of the early stone phase has been subject to adaptation with a series of concrete block walls inserted to sub-divide the space.

Mr. Ives suggests that, given the chronology of its construction, the limited interest of the later brick phases and their subsequent extension and adaptation, he considers that only the early C19th phase, with its stonework construction and detailing, has sufficient 'heritage value' to be considered as a non-designated heritage asset for the purposes of the NPPF.

In considering the potential viable use of the mill, Mr. Ives suggests that his Heritage Review should be read in conjunction with the following :

1. Structural Report (Michael Pooler Associates)
2. Viability Appraisal (Nolan Redshaw)
3. This planning commentary (Roman Summer Associates)

He concludes that, in this context, NPPF paragraph 199 may provide '***a relevant way forward***' :

"Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."



Structural and Viability Considerations

We recorded above the concluding comments of the recent structural report (as enclosed). We will leave the LPA and Inspector Child to read the entire report and to view the very poor and dangerous state of the former mill for themselves.

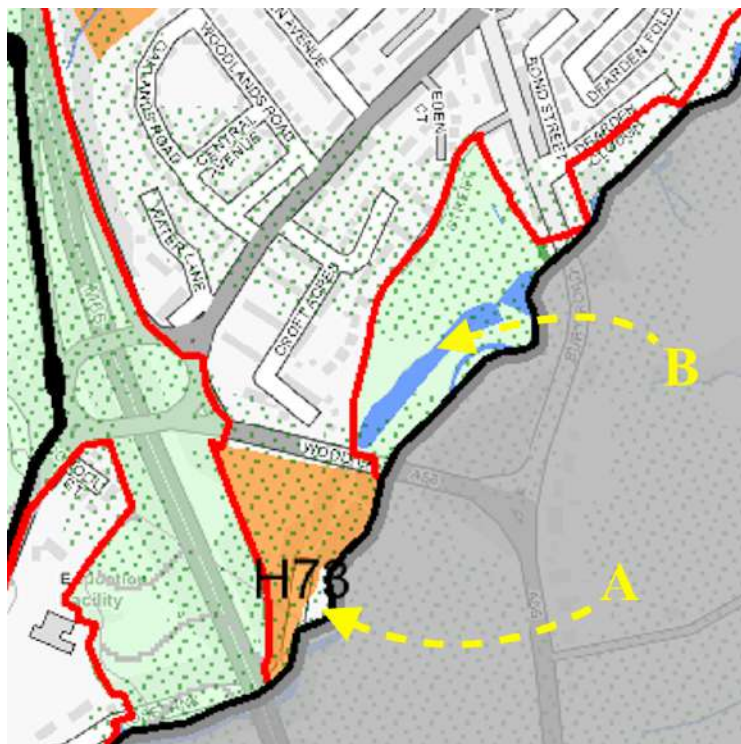
In its Viability report, Nolan Redshaw set out 4 development appraisals based on industry recognised standards and assumptions. While it is always possible to quibble with the finer details of such assumptions, it is self evident from those appraisals that – in realistic commercial terms – there is no prospect whatsoever of Edenwood Mill being retained. The cost of structural repair, restoration and conversion is such that it hugely outweighs the likely level of return, even in the event that the entirety of the land – ie all land, including the omission land that our clients seek to include in Allocation H73 – was to be developed for housing. As Nolan Redshaw conclude :

The only scheme which would make an acceptable profit and is likely to be attractive to any commercial developer would necessitate the clearance of the site and the development of all land for new housing.

It is against that context that Mr. Ives points us to NPPF §199 as *'a relevant way forward'*.

Green Belt / Landscape Considerations

Our clients are pleased to see part of their land proposed to be allocated for housing under site ref: H73 (see draft Policies Map extract on following page). They welcome that allocation, but continue to question and object to the omission of other parts of their land. These omissions are made up of two plots of land, namely Plots 'A' and 'B' as marked on the Policies Map extract below.





Plot 'A' corresponds with the Mill's former car park. It is unclear why this was omitted from the housing allocation, but we understand that the Council now agrees that Plot A ought to be included in the allocation, and we note the LP Inspector's request in this regard.

Plot 'B' is the land to the north of the proposed allocation. This comprises former man-made lodges and adjacent land that runs up towards the rear of houses in Edenfield. Plot B, we contend, is capable of accommodating a modest number of homes.

The land on the west side of Plot B (to the immediate rear / east of Croft Hey) comprises a wooded embankment and the access track (all owned by Turnbull). We venture – through design excellence – that this land might accommodate a small number of very high quality, bespoke, exemplar houses, nestled against the verdant hillside. This will of course be a matter for detailed design and careful consideration of trees and biodiversity, but the separate landscape analysis document and indicative masterplan (by Square Yard) clarify this. We are of course some way from detailed design work, but a 'working flavour' of the type and quality of the small number of exemplar homes we anticipate might be accommodated on that embankment is provided on the precedent images at *Annex C* of this letter.

In view of the above, this pre-application approach (and in turn our ongoing representations to Inspector Child) relates to the entirety of the land, including the current H73 allocation and both omission Plots A and B.

In our previous representations, we commented on the extent to which the land (together with omission Plots A and B) contributes to the purposes of the Green Belt. We revisit that below, and in doing so we continue to question the extent to which it fulfils any of the purposes of Green Belt.

To check the unrestricted sprawl of large built-up areas

The release of this discrete parcel of land will not result in the '*unrestricted sprawl*' of a large built up area. Edenfield is not a '*large built up area*'. The land (as a whole) is an ideal site for release from the Green Belt, for reasons of its self-containment. It is a logical 'flex' extension, which – aside from the Mill itself (which many observers consider to be an eyesore and a stark symbol of blight, decay and anti-social activity) - lacks overall visibility, and the stream that flanks the eastern edge removes any opportunity for 'urban sprawl' or encroachment. Nor is the land 'open' in true sense, which is the principal attribute of any Green Belt. The lower portion is dominated by the large derelict mill complex, and much of the remainder of the land is wooded and flanked by mature vegetation, which serves to erode any real sense or perception of openness.

To prevent neighbouring towns merging into one another

Edenfield is not a town. It is a village. The release of the site for what will be a relatively modest number of homes will be barely perceptible when considering both the actual and perceived gap between settlements and the steep relief of the land, in this case between the village (not town) of Edenfield and the nearest town in that direction - Rochdale (some 6 miles away).



To assist in safeguarding the countryside from encroachment

The large derelict mill complex dominates the immediate setting and fixes the extent of any development. There can and will be no encroachment beyond that. The part of the site that is accessed via Wood Lane is ‘sandwiched’ between the dual carriageway and the mill complex, and in the context of the adjacent M66 and its infrastructure. That part of the site does not read as true countryside, but rather an unprepossessing gap site flanked by hard, manmade development.

To preserve the setting and special character of historic towns

Again, Edenfield is not a ‘town’. It is a village. It can reasonably be described as a historic village, but its historic core is some distance from the subject land. Modern housing flanks its eastern edge (albeit at a higher level). Building houses on site H73 and Parcels A and B will not impact upon the historic core of the village. As acknowledged earlier, the Mill itself does represent part of the historic legacy of the settlement and ought to be considered as a non-designated heritage asset. However, that calls to be balanced against other factors, chief among which is the stark economic reality that it would not come even close to viable to retain the Mill.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

It is very evident that, while the emphasis correctly remains on reusing brownfield land (as is the case for much of H73), there is insufficient brownfield land to accommodate the future needs of Rossendale Borough. It is for that reason the Council is faced with no option but to release sizeable areas of Green Belt land in order to accommodate its needs. Put simply, there is not sufficient brownfield land to accommodate future needs, and as such it cannot sensibly be suggested that the release of this relatively small, discrete parcel of land – most of which is already previously developed - might prejudice the use of derelict and other urban land in the Borough.

We would add that, while the emphasis of the NPPF may be on ‘urban’ land, some might argue that the recycling of derelict land in ‘non urban’ / rural fringe locations is equally important (it most certainly is to the communities who are affected by it).

The above summary suggests to us that the subject land does not serve any true Green Belt purpose, and it is therefore a good, sustainable and obvious ‘flex’ location and ought to be released as a housing allocation in its entirety (ie H73 plus Plots A and B).

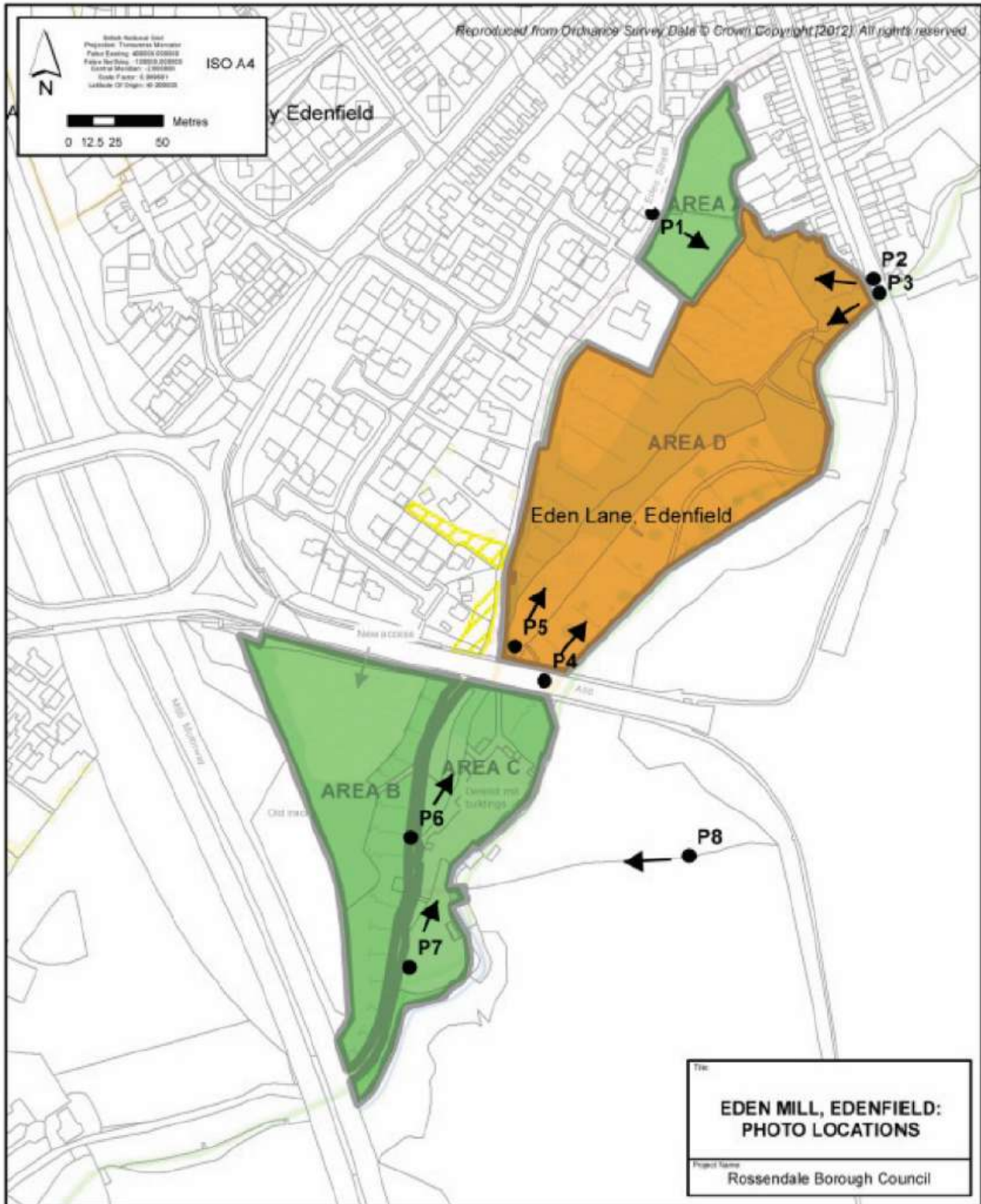
To further inform our representations, Square Yard Landscape Architects have been instructed to produce a *Green Belt Study and Preliminary Landscape and Visual Impact Assessment* for the land, and prepare both constraints and indicative layout drawings to assist the LPA and Inspector Child in their consideration of the proposed allocation and Plots A and B. This has been informed by the advice of both Betts Hydro and Highways Advice on the topics of drainage / flood risk and access issues (see their separate reports).

Square Yard have also critically appraised the ‘*Lives and Landscapes*’ document that was prepared on behalf of the Council, and in that appraisal they raise questions about certain of the assumptions and



conclusions therein (see Square Yard's document entitled "Appraisal of Previous Landscape Assessment for the Site 'Lives And Landscapes'").

Square Yard consider the entirety of our clients' land, but focus in particular on 'Plot B', which is referred to as 'Area D' in the *Lives and Landscapes* assessment :





Square Yard note that, since Lives and Landscapes was produced, Area A on the above plan has been developed for housing.

Based on the guidance set out in '*Guidance for Landscape and Visual Assessment 3rd Edition*', Square Yard suggest that the site as a whole (including Parcel B / Area D) has a **Low** susceptibility to change because :

- It is located within the Settled Valleys LCA and within the Town and Fringe Classification. Key characteristic of both designations included modern residential housing areas.
- The site is comprised in the main of the previous mill pond and could be considered Brownfield or Previously Developed Land under the definition outline in the NPPF.
- The site is bounded on two sides by existing residential development and recent allocations to the south west of the site (as housing land under H73) assumes further development of that nature.
- Existing built form is evident in all views towards and within the site including both residential development and the infrastructure (bridge) features.

As such, Square Yard considers that the site's susceptibility to change (particularly in the form of residential development) is **Low**. It suggests that residential development will not be out of context with either the wider landscape character area or with its location at the town fringe. Residential development does (or will) exist on three sides of Parcel B and as such the proposed development as indicated on the enclosed indicative masterplan would not be out of context with adjacent land uses.

Square Yard considers that the site has a **Medium/Low** Landscape Value. It is noted that the land has no formal landscape designations at national, regional or local level. It has no official designations in terms of biodiversity or habitat value such as SSSI, Nature Reserves etc. While there are some mature trees on the site, those are sporadic and, although of some value in visual amenity terms, are in poor condition as individual specimens. Vegetation across the site comprises mainly of self-seeded saplings and extensive areas of brambles. These are neither high quality visually nor ecologically.

It is suggested that built form on the site comprises the mill pond, dilapidated stone walls, modern security fencing (of poor visual value) and low-quality agricultural fencing. There are no rare or particularly high value elements of built form on the site. The majority of such elements are detrimental to the visual amenity at site level. The site has no notable sense of tranquillity, with road infrastructure both highly visible and audible across the whole area.

Square Yard point to the positive effects that housing development could deliver when considered against the baseline position, such as :

- Improved permeability and public access to the site, with notable improvements to functionality, access and safety of the public environment.
- The removal of a variety of unsightly and unsafe items from the site, improving visual amenity and safety for site users.
- Improved passive surveillance of the site, helping to alleviate evident anti-social behaviour (noted in particular to the area beneath the overpass bridge).



- The introduction of a high quality landscape scheme and habitat management provision which will generate an uplift in visual amenity and biodiversity value over the baseline.

Mirroring our own consideration of the land against Green Belt purposes (as summarised earlier), Square Yard suggest that, based on its analysis of the baseline environment, its recommendation is that 'Area D' ('Parcel B') should be considered appropriate for residential development subject to appropriate design and mitigation measures. It suggests that the existing line of the proposed Green Belt allocation seems illogical, given the existing boundaries of the landscape character area and settlement edge. Given that adjacent sites are (or will be) developed for residential development, Area D sits more logically in context with the settlement to the north and west than with the rural area to the south and east. The exclusion of Area D from the housing allocation would therefore create an odd and inappropriate indent in the settlement edge.

It is therefore suggested that the line of the Green Belt would be better placed following the stream/brook along the eastern boundary of Area D as it does on the adjacent sites. The topography of the valley and line of the watercourse provide a logical edge to the Green Belt. Even with this minor 'flex' in the settlement edge there remains extensive open land to the south and east to continue to support the 5 main functions of the Green Belt.

Indicative Masterplan and Site Capacity

On the basis of its landscape analysis, and informed by the technical advice of Highways Solutions (access matters) and Betts Hydro (drainage and flood risk), Square Yard have produced 2 reports and 3 drawings that accompany these papers, namely :

- Preliminary Landscape and Visual Appraisal
- Appraisal of 'Lives and Landscapes'
- Drawing ref: YD2_EW_SP001 – Site Red Line Boundary Plan
- Drawing ref: YD2_EW-CP001 – Site Constraints Plan
- Drawing ref: YD2_EW-MP001 – Indicative Masterplan

The indicative masterplan indicates realistic locations for housing, access arrangements and areas retained for parking, open space and tree / ecological mitigation management. That plan suggests that, if the entirety of the land was to be allocated for housing, its capacity would be circa 66 dwellings, with ample space for amenity open space and retained woodland / ecological measures.

The ultimate housing figure will of course depend on precise design, layout and density, but these representations (when read in the round) demonstrate that our clients' land is readily capable of accommodating in the region 66 dwellings.

Our clients therefore seek the adjustment to the Local Plan to identify the whole of their land (H73 + Parcels A and B) coming forward within the first period. They wish to emphasise that no robust or convincing evidence or justification has been presented by the Council or any other party to explain the judgement to place the site in the 6 – 10 year category. It can and will come forward sooner than that, and that ought to be reflected in the Local Plan.



We accordingly invite both the LPA and Inspector Child (and of course interested third parties) to consider the following documentation :

- This covering letter
- Heritage Briefing Note (Graeme Ives Heritage)
- Flood Risk Scoping and Sustainable Drainage Statement (Betts Hydro)
- Highways Technical Note (Highways Advice)
- Preliminary Landscape and Visual Appraisal (Square Yard)
- Appraisal of 'Lives and Landscapes' (Square Yard)
- Drawing ref: YD2_EW_SP001 – Site Red Line Boundary Plan (Square Yard)
- Drawing ref: YD2_EW-CP001 – Site Constraints Plan (Square Yard)
- Drawing ref: YD2_EW-MP001 – Indicative Masterplan (Square Yard)
- Structural Report of Edenwood Mill (MPA Engineers)
- Viability Appraisal and Marketing Report (Nolan Redshaw)

It is the landowners' contention that the entirety of the land (including Parcels A and B) is well suited to come forward as a modest, high quality housing development of circa 66 homes on the edge of the built up area of Edenfield. The site is already largely previously developed and served by a vehicular access (albeit that will require replacement). As we have noted, the land contributes little to the purposes of Green Belt, and most of it is not open in the true sense.

The development can readily be accessed via Wood Lane, and trees and hedgerows can be retained and supplemented to further green the environment, together with ecological management and enhancement measures. We note that, unlike other sizeable and frankly overly ambitious / excessively large allocations elsewhere in Edenfield, there is no real community concern about the proposed allocation.

We trust that we have provided the LPA (and in turn Inspector Child and members of the community with an interest in the future of this site and Edenfield) with sufficient information to respond to questions that have been put, and to facilitate a worthwhile pre-application discussion. We look forward to receiving the LPA's written pre-application response in the near future.

If you require any further information or wish to discuss any matters, or wish to arrange a telephone conference, please do not hesitate to contact [REDACTED]

Yours faithfully
for Roman Summer Associates Ltd

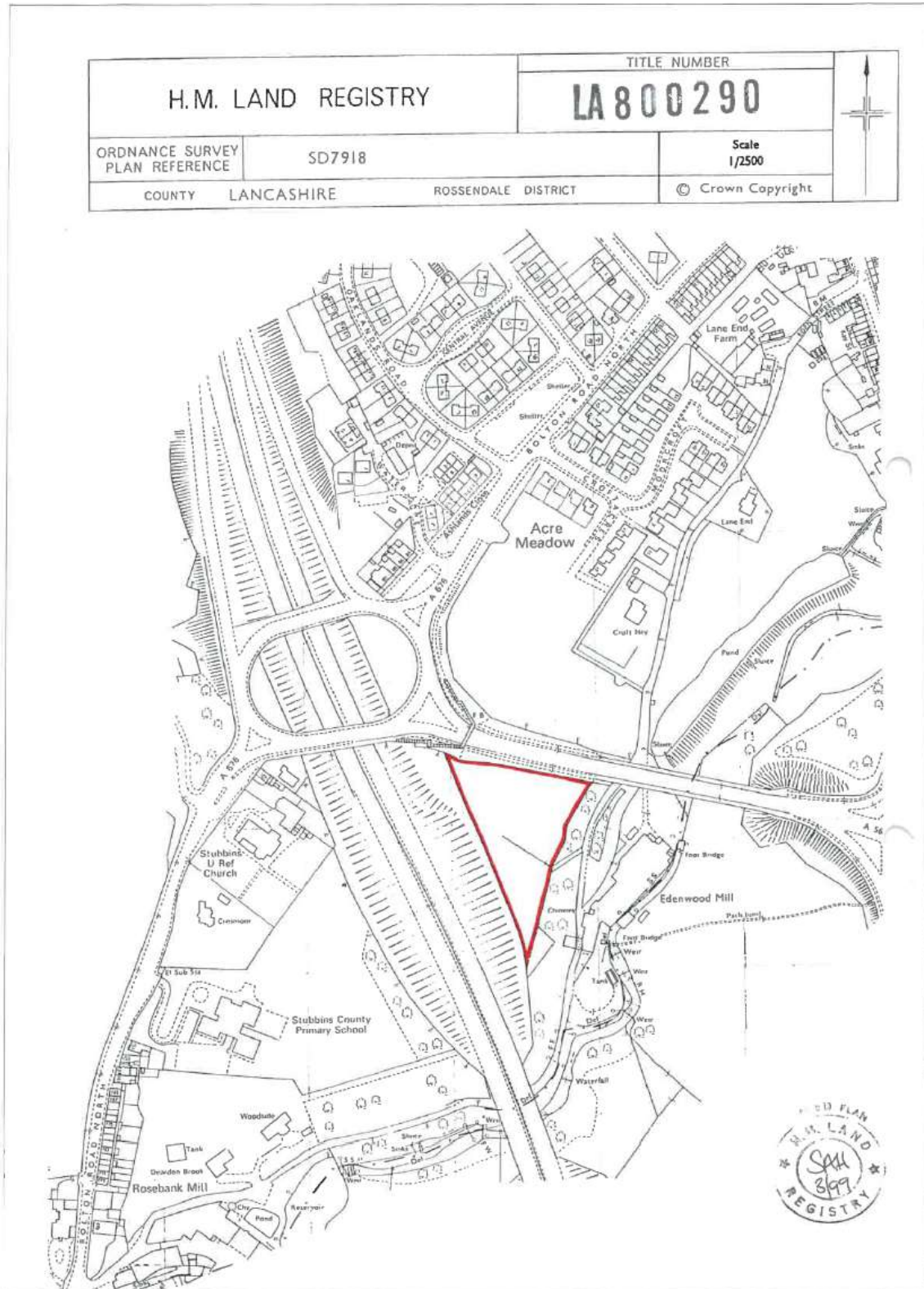
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ANNEX A

**LAND REGISTRY PLAN OF EXTENT OF LAND OWNED BY LIZ FAULKNER, GRAHAM MOXON AND RUTH TAYLOR
[REFER TO APPENDIX I OF NOLAN REDSHAW FOR LAND REGISTRY INFORMATION FOR TURNBULL LAND]**





ANNEX B EXTRACTS FROM SHLAA (AUGUST 2018)

| GENERAL INFORMATION | | | |
|---|---|-----------------------------|-------------------------------|
| Site Ref | SHLAA16271 | Most Recent Source | Planning application 2004/513 |
| Site Name | Edenwood Mill, Ramsbottom | | |
| Greenfield versus Brownfield | Brownfield | Designations | None |
| Site Location - Urban Area, Countryside or Green Belt | Green Belt adjoining the urban area | | |
| Current Land Use | Derelict mill and woodland | | |
| Characteristics of the site reducing the development area | Woodland Stepping Stone Area covering the majority of the site (area available for development reduced by 50% to allow for protection of the habitat) | | |
| Area available for development | 0.43 | Net Development Area (ha) | 0.38 |
| Yield calculated | 11 | Density | 30 dwellings per hectare |
| Yield proposed by applicant | 25 | Current planning permission | <input type="checkbox"/> |
| Crown Copyright. Licence no.: 100023294 | | | |
| AVAILABILITY | | | |
| Land ownership | single ownership | | |
| Comments | private ownership | | |
| Intentions of landowner | developer/landowner willing to deliver residential units in the short term (next 5 years) | | |
| Comments | The landowner submitted a planning application for the conversion of the mill to 25 apartments which has been approved but is now expired (2004/513). The landowner has renewed an interest in developing the site (email received 16.01.2017). | | |
| Legal constraints / ownership issues | no legal or ownership constraints known | | |
| Comments | | | |
| SUITABILITY | | | |
| Topography | gradient present but can be mitigated | | |
| Comments | Flat part along the brook but steep slopes going up towards the west | | |
| Vehicular access | access is a major constraint and significant new infrastructure is required | | |
| Comments | Significant constraints as Eden Lane and Rosebank are narrow lanes. Potential access via the site to the north. | | |
| Distance to strategic road network | within 1.5km (approximately 1 mile) | | |
| Comments | 780m to M66 junction | | |
| Access by public transport | high frequency bus service (half hourly or more frequent) within 400m (0.24 miles) | | |
| Comments | 380m to bus stop of Bolton Road North with access to several services | | |

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| | |
|--|---|
| Access to primary school | access within 500m (0.31 miles) |
| Comments | 460m to Stubbins Primary School |
| Access to secondary school | access within 5km (approximately 3 miles) |
| Comments | 3690m to Haslingden High School Specialist Arts College and 3.5km to Woodhey High School |
| Access to GP surgery | access within 3km (1.8 miles) |
| Comments | 1.7km to nearest GP in Ramsbottom |
| Access to a local centre or convenience shop | access within 1.5km (approximately 1 mile) |
| Comments | 1.3km to Edenfield local centre and 1.9km to Morrisons in Ramsbottom |
| Access to a park or play area | access within 1.5km (approximately 1 mile) |
| Comments | 1040m to nearest play area |
| Flood risk | less than 50% in flood zone 2 or affected by medium surface water flood risk |
| Comments | Less than 10% of the site is within flood zone 3 and 2. Also, less than 10% of the site is at high and medium risk of surface water flooding. |
| Ecological value | located in a Biological Heritage Site, Local Geodiversity Site or Core Area or Stepping Stone areas |
| Comments | Majority of the site within a Woodland Stepping Stone Habitat. The area available for development has been reduced by 50% to allow the protection of part of the habitat. |
| Recreational value | presence of Public Rights Of Way or informal use |
| Recreational value comment | Public right of way going through the site |
| Heritage assets | site does not contain or adjoin a Listed Building and site is not within or adjoins a Conservation Area |
| Comments | Chatterton / Strongstry Conservation Area situated 300m to the west of the site |
| Landscape value | low landscape impact |
| Comments | Settled Valleys. The independent landscape study concluded that the site is suitable for development with mitigation. |
| Land contamination | potential contamination issues or known issues but capable of remediation |
| Comments | Potential land contamination on a large part of the site |
| Mineral sterilisation | if entirely within or partly within a Mineral Safeguarding Area or surface coal area |
| Comments | May require further site investigation |
| Land instability | if no known issues and situated in a low risk development area |
| Comments | |

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| | |
|-------------------------------------|--|
| Proximity to dangerous structures | not within any HSE consultation zones |
| Comments | |
| Bad neighbour | site in residential or retail area |
| Comments | |
| Constraints due to utilities | no known utilities infrastructure on site |
| Comments | Waste water infrastructure under the lane, not affecting the development |
| ACHIEVABILITY | |
| Extra costs of development | if significant extra costs required |
| Comments | New vehicular access. Land contamination report. Flood risk assessment. Ecological impact assessment. Demolition of derelict mill. |
| Market area | high value market area (£190 to £210/sqm) |
| Comments | |
| CONCLUSION | |
| Availability summary | Available now |
| Justification | The landowners submitted a planning application for the conversion of the mill into 25 apartments in 2004, and renewed an interest to develop the site (email received in January 2017). |
| Suitability summary | Suitable in medium to long term |
| Justification | Planning permission was granted in 2004 for the conversion of the mill into 25 apartments (ref 2004/513). However, the vehicular access is a significant constraint for the development of the site. The site is also identified as a Woodland Stepping Stone Habitat and therefore the area available for development has been reduced by 50% to allow protection of the habitat. It is considered that the site can become suitable in the medium term subject to the access being improved, the woodland habitat being preserved and if it is demonstrated that there are no flood risk issues to the proposed residential units. |
| Viability and achievability summary | Achievable now |
| Justification | Significant extra costs have been identified with the development of the site (e.g. demolition costs, creation/improvement of the vehicular access). However the site is within a high value market area, therefore the development can still be viable. It is considered that the site can be developed quickly once the constraints have been addressed. |
| Conclusion | Developable in the medium to long term (within 6 to 10 years, or after 10 years) |
| Justification | The site is considered to be available as the landowner submitted a planning application for the conversion of the mill into 25 apartments in 2004 and renewed an interest in developing the site in January 2017. The site can become suitable if the vehicular access is improved or if a new access is created. The woodland habitat should also be preserved and the flood risk should be adequately mitigated. The development is considered viable as the site is situated in a high market value area. Overall, the site is developable in the medium term. |

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Delivery (next 5 years) Delivery (6 to 10 years) Delivery (11 to 15 years)



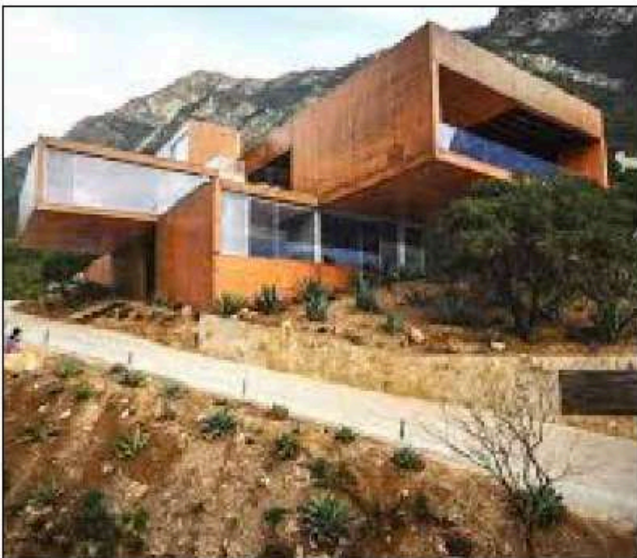
ANNEX C

PRECEDENT IMAGES FOR POTENTIAL HOMES ON THE EMBANKMENT ON THE WEST SITE OF 'PLOT B'



David White Architecture

David White Architecture



[REDACTED]

[REDACTED]

Our reference: 2020/0013/PREAPP

Date: 4 December 2020

Dear [REDACTED]

Reference No: 2020/0013/PREAPP

Proposal: Pre-Application Enquiry: Proposed demolition of Edenwood Mill and the erection of up to 66 dwellings, via a replacement access from Wood Lane

Location: Edenwood Mill, Edenwood Road, Ramsbottom, BL0 0EX

Introduction

I write in response to your request for advice in relation to Edenwood Mill in Ramsbottom. Advice is sought on a residential development involving the demolition of the mill, and up to 66 dwellings. The advice is based upon the SITE MASTERPLAN drawing MP0001. The enquiry is accompanied by a number of supporting documents, including a Marketing Report and Heritage Statement.

You will be aware that the content and advice given are as at the date of this letter, and you are asked to note that matters may be subject to change. Also, a full assessment of the proposal can only be made as part of a planning application. Therefore comments in this letter are made without prejudice to the determination of any future planning application.

Site and context

The site lies wholly within the countryside, and is designated as Green Belt. It lies outside of the settlement of Edenfield but lies adjacent to it, in part. The site straddles

Wood Lane, stretching to the north and south of it – your pre-application letter entitles the parcels ‘A’ and ‘B’ as follows:



Extract from pre-application letter

Parcel A contains the remnants of Edenwood Mill, land within its curtilage, and steeply sloping open land with tree cover. Parcel B to the north of Wood Lane comprises steeply sloping grassland, tree cover, and an elongated overgrown millpond.

A watercourse flows through the site, and it lies within flood zones 1, 2 and 3. There are protected trees immediately to the north of Wood Lane, around its centre point, which appear to be adjacent to but outside of the site boundary. Public rights of way (PROW) follow the western boundary of the site, affording views into the site.

The site is not within or adjacent to a conservation area, nor within proximity of a listed building. However, Edenwood Mill is a non-designated heritage asset.

Consideration of issues

As part of the local plan work, the constraints associated with this site include Green Belt designation, landscape, flood risk, ecology, heritage, access and noise.

Green Belt

The Emerging Local Plan proposes the allocation of Parcel A (the land to the south of Wood Lane) for housing, with an estimated capacity of 47 dwellings. Parcel B (to the north of Wood Lane) is to be retained within the Green Belt. Therefore, subject to the

Subject to the Adoption of the Local Plan and the inclusion of this site within it, residential development within Parcel A would be acceptable in principle. However, Parcel B is proposed to retain its Green Belt designation, and this is considered in more detail below.

The Green Belt Review (2016) independently assessed the performance of the Borough's Green Belt against the purposes of Green Belt as set out in para 80 of the NPPF. The pre-application site (Parcels A and B combined) was assessed as [Parcel 49](#). The study concluded that the site performed moderately in checking the unrestricted sprawl of the large built up area of Ramsbottom/Bury, and in particular performed strongly in preventing the merging of Stubbins with Edenfield. The study also stated that Parcel 49 had a weak role in terms of safeguarding the countryside from encroachment due to the presence of the A56 dissecting the parcel, and the visual influence of the M66 motorway and its junction. Overall it was concluded that this land did not have any potential for release from the Green Belt.

Although the Green Belt Review does not recommend the release of Parcel 49 for development, the presence of the vacant and derelict Edenwood Mill within the parcel (Parcel A) and the previous planning consent weighed significantly in the decision to bring this previously developed land back into use. Indeed, paragraph 138 of the NPPF highlights that once all other options for development located outside of the Green Belt have been exhausted, then land situated within the Green Belt which has been previously developed or is well-served by public transport should be considered first.

Conversely, the sole building within the northern section of Green Belt Parcel 49 is a detached dwelling on Eden Lane, which is not contained within Parcel B in any case. There are no other urbanising features within Parcel B and the land is greenfield. The Green Belt Review identifies that the A56 dual carriageway dissects the parcel in two, which Officers consider reinforces the distinction between the northern and southern parcels. In conclusion, Officers do not support the release of Parcel B for residential development.

Effects of the development on the landscape

The [Lives and Landscape Study](#) (2015) assessed the full site for its sensitivity to development in terms of landscape.



Extract of plan from Study to show Areas B, C and D

The study considers that the land to the south of Wood Lane (your Parcel A which is referred to as Areas B and C in the Study) could be developable subject to the woodland being retained as much as possible, and if the detailed mitigation measures listed within the Study are followed. These are summarised below:

- Submission of a tree impact plan and tree constraints plan prepared by a qualified arboriculturalist, which clearly identifies root protection areas (RPAs) for trees on the site.
- Plans also to consider the impact of street lighting on wildlife and suitable mitigation.
- Protection and retention of existing trees bounding the site, ensuring robust tree protection measures are used during site works.
- Development shall be restricted to flat area.
- Existing hedge to A56 boundary to be retained and managed, ensuring gaps are filled.
- Retention, enhancement and management of surrounding woodland essential.
- Site layout to allow views to opposite side of the valley to be retained across western area side of site, on approach to M66 roundabout.
- Access road to Area C to be constructed along existing track to protect and minimise damage to surrounding trees as stated above.
- Reduce the 'mass' of the built development by incorporating tree groups within it.
- Adopt a sensitive design to retain rural feel of FP 111 between Areas B and C.
- Maximise the opportunity to enhance the route of FP 111/112 beyond the road bridge, through the site by designing a wooded route through the housing.

However, Parcel B (referred to as Area D in the Study) was found to be unsuitable for development on landscape grounds due to the high susceptibility of the site to

landscape change and its significant value to the local community. The study states that for Area D “...its steep wooded sides, general topography and requirement for substantial vegetation clearance for any vehicle access, means that housing development would have undue affect upon the landscape, and is considered inappropriate”.

The Study recommends that any developments within the Areas A, B and C, contribute towards the development of a local nature reserve within Area D, with pedestrian access along newly created footpaths, managed by local community. This will be explored as part of any future planning applications and developers will be expected to have had regard to this matter.

As such, Officers do support the principle of residential development on Parcel A, subject to all mitigation measures listed above being met. Officers do not support the principle of residential development on land within Parcel B, owing to unacceptable impacts on landscape character.

Related to any release of Green Belt land is the need to provide compensatory improvements to the environmental quality and accessibility of remaining Green Belt as set out in the NPPF (para 138). You will be aware that the Council has just concluded a consultation on such measures for the Local Plan examination (Examination Library Reference [EL8.008.10](#) https://www.rossendale.gov.uk/downloads/download/11331/examination_library_8_-_items_arising_from_action_list_document_el6001)

Ecology

Ecological considerations and biodiversity matters will be important to the overall acceptability of any residential development on this site. You will be aware that a development should be able to demonstrate net biodiversity gain where possible, and upon passing of the Environment Bill, this will be mandatory.

The land to the south of Wood Lane comprises a Woodland Stepping Stone Habitat as identified on the [Lancashire Woodland Ecological Network map](#). As stated in the landscape study, the woodland area situated on the steep slopes of the site and around Edenwood Mill should be retained as much as possible as part of the development. The woodland could also provide noise attenuation from the M66 motorway and A56 Wood Lane.

Any application shall be accompanied by tree impact plans, ecological assessments, species surveys and biodiversity calculations. It is important that the final application drawings to be submitted with any future application have been shaped by the findings of these reports, to ensure their conclusions are integrated into the development from the outset.

Design and layout

The comments below relate to Parcel A. Design comments have not been provided in relation to Parcel B, as Officers do not support a residential development on this element.

- The development is dominated by hardstanding i.e. roads and driveways. Parking should be provided to the sides of dwellings as much as possible, with front gardens landscaped. The submitted layout should be amended to address this issue.
- Many of the gardens are too small to serve 3 and 4 bedroom dwellings. They will not provide occupants with a high standard of amenity as is required by the NPPF and will need to be larger.
- Many of the dwellings are arranged in long terraced rows and Officers are concerned that such a formation is not appropriate in this semi-rural location. This is compounded by the creation of parking to the front, adjacent to the proposed road.
- It may be necessary to provide an 8m easement to the watercourse which could affect the layout. Please discuss further with the EA.

For the reasons above, Officers do not support the proposed layout as submitted.

Heritage

Advice has been sought from the Council's heritage advisor at Growth Lancashire who has made the following comments:

"The mill is recorded on the HER and as such is identified as a non-designated asset.

There is no statutory duty to preserve non-designated assets.

The NPPF states that LPA's should take account of; a. The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b. The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c. The desirability of new development making a positive contribution to local character and distinctiveness.

P.197 states that the significance of non-designated heritage assets should be taken into account in determining development proposals. In weighing applications a balanced judgement will be requires having regard to the scale of any harm/loss and the significance of the heritage asset.

On the basis of the information provided to me I feel the key heritage issue for the LPA to consider is: 1. Whether the proposed residential scheme would unduly harm a non-designated heritage asset of significance.

Having visited the site it seems to me that the former Edenwood Mill is in a peril-less state. The heritage report provides a potted history to the site and development of the mill, which was likely constructed (in some form) between 1796-1806. The mill appears and is named on the 1851 and 1893 OS maps as a cotton mill. By the end of the C19 the mill complex had been substantially altered and extended including the addition of the brick chimney. By

the early C20 the mill is referred to as a dyeing and finishing mill and later in 1929 as a cotton dyeing mill.

The Mill has clearly been vacant/un-used for a long period of time and whilst I note attempts had been made to convert the building no scheme was ever implemented. Over the last 15 years or so the building has continued to deteriorate to such an extent that much of its value has been lost and I doubt that a conversion scheme could salvage much of the original structure, in any kind of coherent way.

The Lancashire Textile Mills survey 2012 identified the mill as being in a very bad condition involving structural failure which has resulted in a loss of significance.

It seems to me that the applicant's Heritage Briefing report provides a fair assessment of the significance of the extant mill building and concludes that much of its local significance has been lost by its continued deterioration and changes made to its historic setting by the construction of the M66 and associated A56 flyover.

Whilst the former Mill may have exerted a positive influence on the area, in the past, I feel that today we have acknowledge that the remaining structures can only be regarded as having a low significance and are of limited interest.

Conclusion / recommendation

NPPF Paragraph 197 states that the significance of non-designated heritage assets should be taken into account in determining development proposals. In this instance, given the re-development proposal involves demolition and clearance of the mill site and the scale of harm will be total, the impact caused by the loss will be low.

This low level loss of significance will need to be considered in the LPA's planning balance and be considered, without weighting, against all other material matters, including any benefits generated by the scheme."

Contamination

Given the site's former industrial use, and proposed residential uses, it will be necessary for any planning application to be accompanied by contamination reports, prepared by a suitably qualified person. This will be reviewed by the Council's Contaminated Land Advisor as part of the determination of any application.

Highway matters

Officers recommend utilising Lancashire County Council's formal pre-application advice service to discuss the proposed access arrangements in detail, prior to the submission of any application.

Flood risk and drainage

Any application will need to be accompanied by a site specific flood risk assessment and a sustainable drainage strategy which needs to clearly take account of any recommendations for flood mitigation/resilience made in the SS-FRA, and set out a justified approach to a sustainable drainage design for the site, in line with the Technical Standards for SuDS and The SuDS Manual.

You may want to utilise the Lead Local Flood Authority's and Environment Agency's formal pre-application advice service prior to the submission of a planning application to fully address any potential flood risk issues and matters of layout including the need for an easement to the watercourse.

Residential amenity

Given the proximity of the site to the A56 and flyover, a noise impact assessment will need to be undertaken to establish whether a residential development will be suitable. If mitigation measures are necessary, any scheme will need to be designed to incorporate these.

Conclusion

In the event that the Emerging Local Plan is adopted in due course, Officers would support the principle of residential development on Parcel A, subject to the detailed consideration of matters including landscape, ecology, design, noise, highways etc. Officers have raised a number of concerns in relation to the proposed site layout, and as it stands, the scheme would not be acceptable in design terms and this must be revisited.

You have been advised to seek formal pre-application advice from the Highway Authority, LLFA and EA to discuss the respective technical matters in more detail.

Officers do not support the principle of residential development at Parcel B, owing to both its Green Belt status (it is not proposed to be released from this designation) and the associate harmful impacts such a use would cause to its landscape character.

Any further advice would be charged at the follow up rate (fees set July 2020).

I hope this answers your queries, please do not hesitate to contact me if you require any further assistance.

Yours sincerely,

[Redacted signature block]



GRAEME IVES
HERITAGE PLANNING

Heritage Briefing

Land Off Wood Lane, Edenfield

Turnbull and Stockdale Ltd

March 2020

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1.0 Introduction

- 1.1 This Heritage Briefing has been prepared on behalf of Turnbull and Stockdale Ltd to consider the potential heritage value of Edenwood Mill, located on land off Wood Lane, Edenfield (the 'appraisal site') in respect to a proposed housing allocation in the emerging Rossendale Borough Council Local Plan.
- 1.2 Proposed housing allocation H73 incorporates the derelict Edenwood Mill, which principally comprises an early C19th range constructed of stone and an early C20th phase that is constructed of brick. The proposed allocation would require the removal of the mill buildings. Two additional parcels of land are also proposed for inclusion in the current draft allocation, comprising a small area of land immediately to the east of the mill and a larger area of land to the north of the A56, which cuts across the valley on a concrete viaduct immediately to the north of the mill.
- 1.3 The mill buildings are in a derelict condition. The mill is not included on the 'national list' as a 'designated heritage asset' and is not identified on the Rossendale Borough Council website as a heritage asset. However, during the recent Local Plan EIP the Inspector raised a question as to whether the mill could have 'heritage value' and whether this should inform the proposed allocation.
- 1.4 This Heritage Briefing therefore provides an initial appraisal of the mill buildings with reference to the relevant policies and definitions of the National Planning Policy Framework (NPPF), guidance contained in the Planning Practice Guide (PPG) and the associated Historic England guidance on Managing Significance in Decision-Taking in the Historic Environment Good Practice Advice in Planning: 2 (2015).
- 1.5 The NPPF places the following requirements on applicants:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understanding the potential impact of the proposals on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation." (NPPF Paragraph 189)
- 1.6 This Heritage Briefing provides a proportionate description of Edenwood Mill, which has been informed by an initial site visit, desk-top research and an Historic Environment Record (HER) search. Chapter 2 identifies the heritage assets that could be relevant to the proposed housing allocation and Chapter 3 describes their significance, proportionate to their importance.

2.0 The Relevant Heritage Assets

Introduction

- 2.1 The NPPF defines a heritage asset as follows:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”

Designated Heritage Assets

- 2.2 The NPPF confirms that designated heritage assets comprise, World Heritage Sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields and conservation areas.
- 2.3 The ‘national list’ (www.HistoricEngland.org.uk) was reviewed on 23rd March 2020. The national list identifies all designated heritage assets with the exception of conservation areas, which are generally designated by Local Planning Authorities (LPAs). There were no designated heritage assets identified on the national list either within or adjoining the proposed allocation site. The nearest designated heritage assets are a small cluster of listed buildings off Stobbins Vale Road, approximately 900 metres south west of Edenwood Mill and separated from the proposed allocation site by the M66 and the topography of the Irwell Valley. A further isolated

listed building at Gap Farm, off Bury Old Road, was identified approximately 1,000 metres south-east of Edenwood Mill. Again, the sense of separation is accentuated by the topography of the eastern side of the Irwell Valley.

- 2.4 The Rossendale Borough Council website was consulted on 23rd March 2020 to identify the location of any relevant conservation areas. The Chatterton and Strongstry Conservation Area is located to the west of the proposed allocation. However, it is physically separated by the M66 corridor, which is quite well enclosed with mature tree cover to the south of the junction with the A56. The landform between Bolton Road North and the River Irwell, which contains most of the conservation area, descends from east to west into the valley floor, and the proposed allocation site is well contained in the secondary valley of the Dearden Brook. It is therefore considered that neither the setting or significance of the conservation area would be affected by the proposed allocation. There are no other conservation areas located within the vicinity of the proposed allocation site.

Non-Designated Heritage Assets

- 2.5 Historic England guidance on Decision-Taking in the Historic Environment Good Practice Advice Note 3 (2015) advises that non-designated heritage assets may be identified through the following mechanisms:

“Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application.”

- 2.6 Rossendale Borough Council does not appear to have published a ‘local list’ of locally interesting heritage assets and instead their website directs potential inquiries to the Historic Environment Record.
- 2.7 The Lancashire HER was consulted on 20th March 2020 and identifies the following ‘monuments’ associated with the proposed allocation site:

Table 2.1: HER Monuments Relevant to the Proposed Allocation Site

| HER Reference: | Site Name: |
|----------------|--|
| PRN 8329 | Wells shown on 1 st Edition OS Map. |
| PRN 8330 | Edenwood Mill |

- 2.8 Given the inclusion of Edenwood Mill on the HER, the mill has been identified as a non-designated heritage asset for the purposes of this Heritage Briefing.

3.0 The Significance of the Heritage Assets

Introduction

- 3.1 The NPPF defines significance (for heritage policy) as:

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”

- 3.2 The setting of a heritage asset is defined by the NPPF as follows:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

- 3.3 The National Planning Practice Guide (NPPG) further advises, that:

“The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience

an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.”

- 3.4 Historic England guidance on The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition, 2017) confirms that:

“Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

- 3.5 The Historic England Good Practice Advice Note provides a non-exhaustive checklist of potential attributes of setting, concerning the ‘physical surroundings’ and ‘experience of the asset’, that may help to elucidate the contribution of setting to significance and have been used to help inform this Heritage Statement.
- 3.6 The description of the significance of the heritage assets, provided below, is proportionate to their importance and the likely impact of the proposed development on their significance, including their setting.

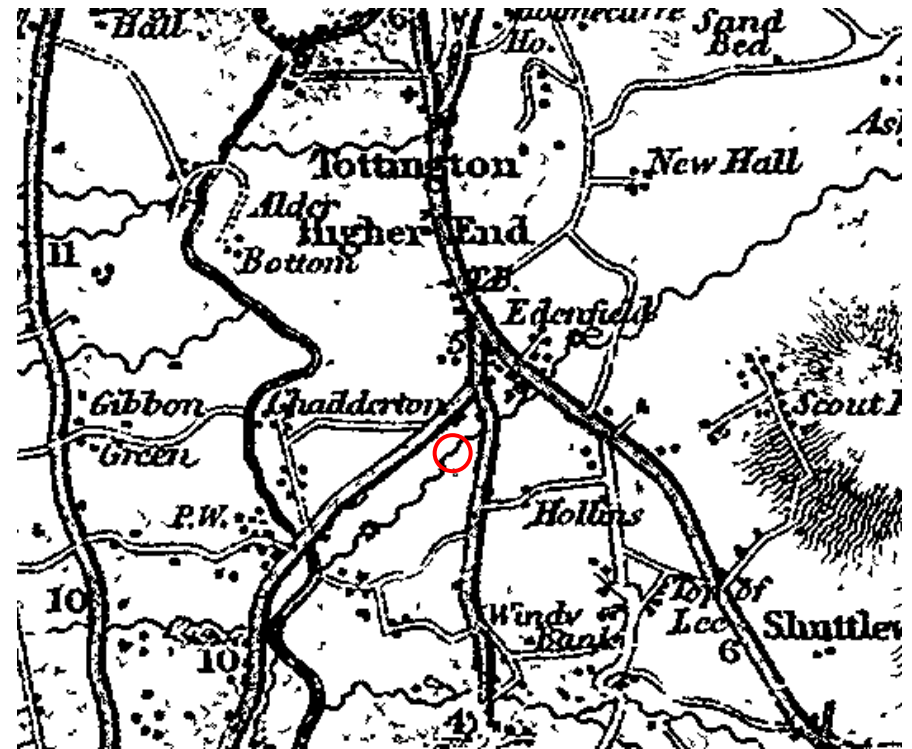
The Historic Development of the Appraisal Site and Adjoining Area

- 3.7 The wider context of the Wood Lane area changed considerably during the C20th, particularly in respect to highway infrastructure and therefore the urban morphology of the area is summarised below to help gain an understanding of the setting of the heritage assets.
- 3.8 In this context, Historic England’s guidance on The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (2017) advises:

“Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset’s setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term. Settings may also have suffered negative impacts from inappropriate past developments and may be enhanced by the removal of the inappropriate structures.”

- 3.9 The HER report, below, advises that Edenwood Mill was constructed between 1796-1806, however it is not identifiable on Hennett’s Map of Lancashire (1829) albeit that map is at a large scale that by no-means identified every building.

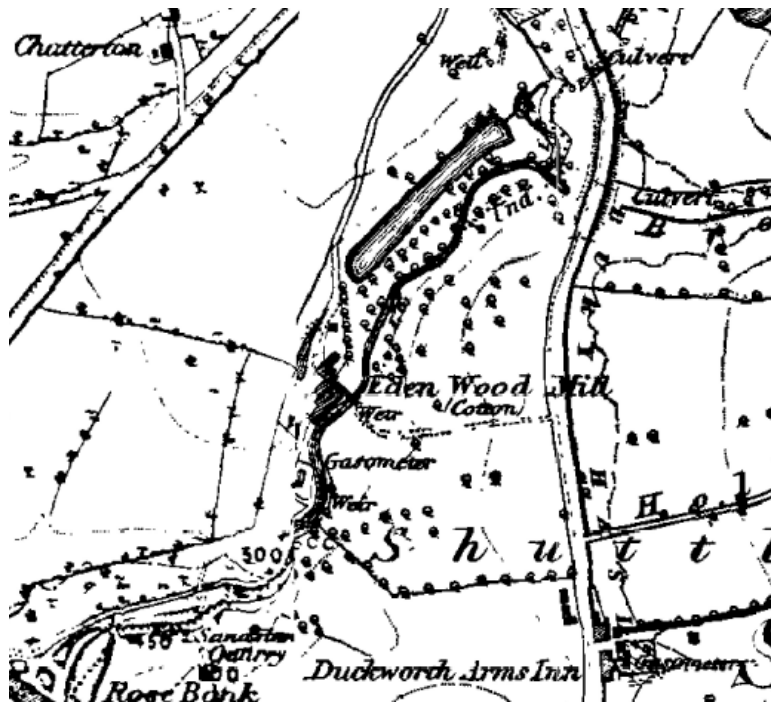
Figure 3.1: Hennett’s Map of Lancashire (1829)



- 3.10 Greenwood’s Map of Lancashire (surveyed 1818 and published in 1830) is similarly detailed, although it does not actually name ‘Edenfield’.
- 3.11 ‘Eden Wood Mill’ is clearly identified on the Ordnance Survey Map of 1851 as a cotton mill, with a linear mill pond to the north and a gasometer to the south of the mill. The 1851 map is not as detailed as the 1893 Ordnance Survey Map, and suggests that the mill

buildings adopted a slightly different alignment to the detail shown in 1893. If this was correct, it would suggest that the existing stone mill building was constructed between 1851 and 1893 and may have superseded the original mill of the early C19th. However the difference could also be explained by the cartography.

Figure 3.2: Ordnance Survey Map 1851 (1:10,560)

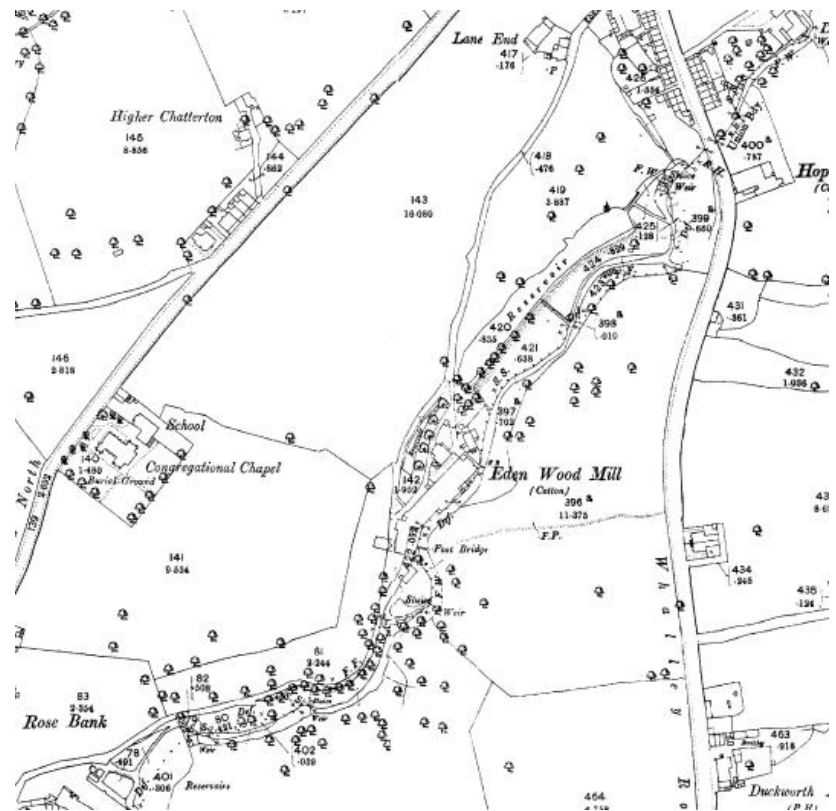


3.12 The 1893 Ordnance Survey map confirms that the mill had been substantially extended by that time with a linear range that projected north-east from the earlier stone element, the alignment of which conformed to that found on site today. The southern

(stone) range of the mill formed an 'L' shaped plan with a small western wing connected to the main range with an archway that crossed the lane.

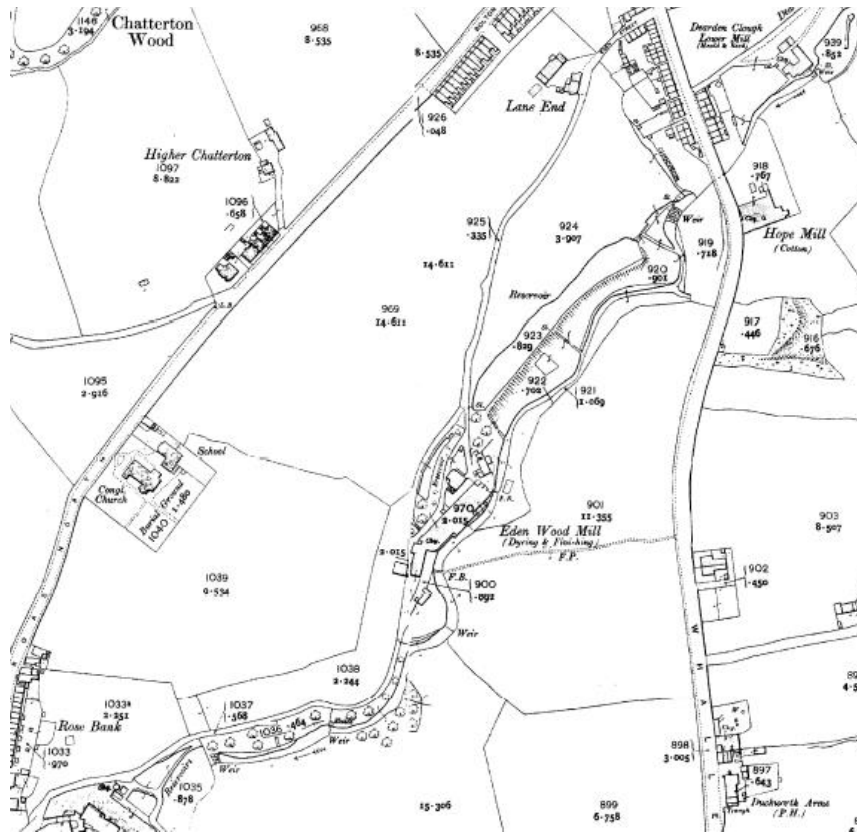
3.13 More widely, further urban development had taken place, including terraces of houses to the north and a Congregational Chapel and school to the west.

Figure 3.3: Ordnance Survey Map 1893 (1:2,500)



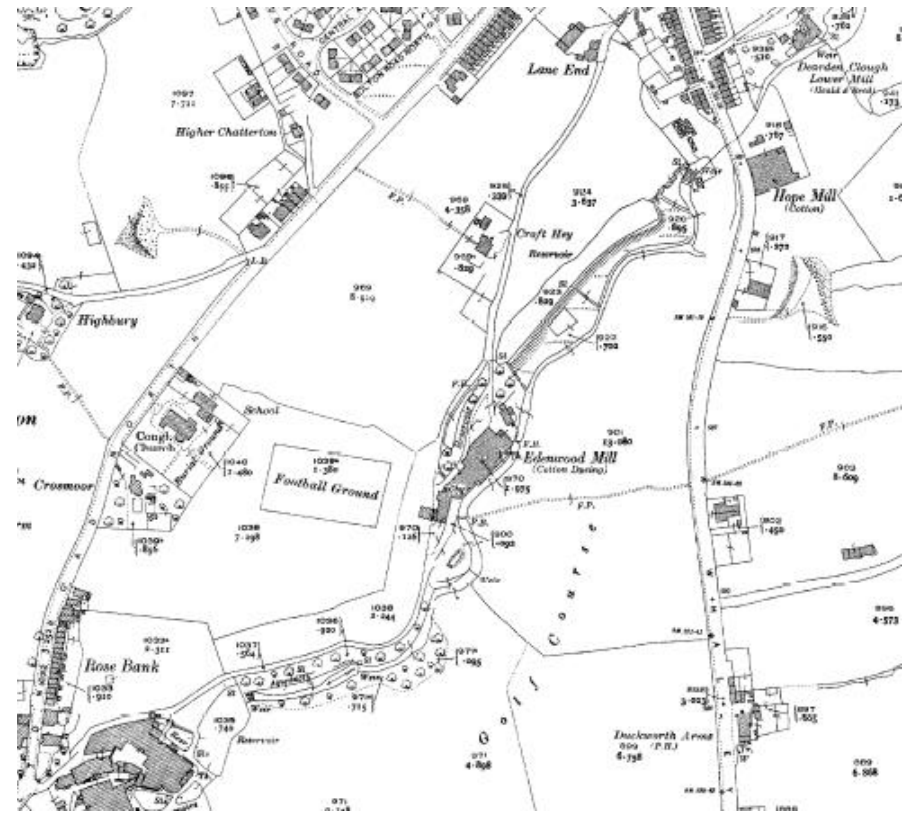
- 3.14 The tall brick chimney appears to be drawn on the 1893 map but is not labelled, however by 1910 it is clearly identified. The mill complex is also referred to as 'dyeing and finishing' rather than as a 'cotton' mill, which is specified on the 1851 and 1893 maps. The 1910 map also indicates that the archway that crossed over the lane from the stone mill building had been removed by that time.

Figure 3.4: Ordnance Survey Map 1910 (1:2,500)



- 3.15 The footprint of the mill appears to have evolved by 1929 with an extension of the north-western part of the mill that extended the building slightly towards the lower reservoir and required the removal of a detached inverted 'L' shaped building. Edenwood Mill was referred to as a 'cotton dyeing' mill at that time. A football pitch had been constructed to the west of the mill complex and a golf course occupied the eastern side of Dearden Brook.

Figure 3.5: Ordnance Survey Map 1929 (1:2,500)



- 3.16 By 1963 a small wing of the mill had been extended across the brook, and the footprint of the mill adjoining the brook had changed slightly. To the west the football pitch had been removed and the former Congregational School had become the Ramsbottom Stubbs County School.

Figure 3.6: Ordnance Survey Map 1963 (1:2,500)



- 3.17 The Ordnance Survey Map of 1973 confirms that the footprint of the mill remained unchanged at that time. However, highly significant changes were taking place within the vicinity of

Edenwood Mill with the construction of the M66, the associated junction to the A56 and the viaduct that carries the A56 across the Dearden Brook valley between the mill and mill reservoir.

Figure 3.7: Ordnance Survey Map 1973 (1:2,500) (partially complete)



- 3.18 The Ordnance Survey Map of 1982-87 confirms the construction of the highway infrastructure that is located close to the north and west of Edenwood Mill. The mill complex has since been vacant for

a considerable period. In 2006 planning permission (Reference: 2014/513) was granted for the conversion of the mill into residential apartments. That scheme involved the demolition of the chimney, part of the brick phase constructed over the watercourse and the replacement of the pitched roof over the brick element. The Officer's Report to the Development Control Committee (dated 10th July 2006) did not refer to heritage as a material consideration.

Figure 3.8: Ordnance Survey Map 1982-87 (1:10,000)



3.19 Since that time the condition of the mill has deteriorated significantly, which is illustrated by a recent aerial view of the roof.

Figure 3.9: Aerial Photograph (Google Earth Pro, 2019)



Significance of the Non-Designated Heritage Assets

Edenwood Mill (HER Reference: PRN 8330)

Heritage Value

3.20 The HER entry describes the mill as follows:

“Cotton mill built between c.1796 and 1806; shown as a finishing and dyeing mill on OS 25 inch map 1910; still extant although now empty and derelict.

Eden Wood Cotton Mill is shown on the OS first edition 1:10,560 map of 1851 with a large millpond to the north and a gasometer to the south. It was significantly increased in size between that date and the production of the 1893 1:2,500 mapping. The layout of the extended mill seems similar to the 1910 1:2,500 mapping but as noted below it had changed function.

Eden Wood Cotton Mill was built between c. 1796-1806, and is shown on the Ordnance Survey first edition 1:10,560 map with a large millpond to the north and gasometer to the south. By the 1850s, the mill was occupied by the firm of Anderton and Co., cotton manufacturers, also of Fountain Mill in Accrington. However, this firm was dissolved by mutual consent in 1854, and the mill was run thereafter by Peter Hindle (Preston Guardian 24 June 1854). By the time of the Ordnance Survey map of 1911 [dated 1910] it was labelled as a dyeing and finishing mill. It is shown on the current 1:10,000 sheet. Now empty and derelict (2013) – subject to some

vandalism and arson, see images on the web. Some interest in demolition and redevelopment.

A pre-app meeting held with the owners/agents on behalf of Eddenwood Mill, Edenfield, Rossendale The OAN Mills Survey report identifies it as at risk, in very bad condition and of medium significance (total floor space = 3124m – all vacant). I have attached the minutes of that meeting held with colleagues from DC and forward planning and it looks as though this could be another mill up for demolition in the near future. I haven't had chance to make a site visit yet but I am concerned that the heritage significance is being overlooked and wanted to flag it up as a candidate for further investigation before we can a.... notification of demolition on it. Colleagues feel that as a minimum we would seek to condition a building survey on the site. I believe the significance elements relate to an early stone-built mill (i.e. C19) which has hood moulding to some of the windows. Later elements include a vast brick-built extension and chimneys (the latter being visible from the M66 as an identifiable landmark at the local authority boundary between Rossendale and Bury). Pevsner refers to the mill in his Lancashire North Buildings of England series as a cotton mill and one of the few remaining traces of industry in this particular area of the valley. The mill is unlisted, does not lie within a conservation area but is within the green belt. However, it is considered to be a brownfield site (taken from email correspondence with the LPA Conservation Officer dated 10th May 2013).”

3.21 It is not clear what evidence has been used to suggest such an accurate date for the construction of the first phase of the mill (1796-1806), the available cartographic evidence has not provided that information and there is no reference identified in the HER

report. Pevsner Buildings of England Lancashire: North (Hartwell and Pevsner, 2009) simply advises “... Started in the early C19, which may be the date of the stone part with heavy hood-moulds. Later brick chimney and extensions. ...”

- 3.22 The above correspondence contained in the HER suggests that the most significant part of the mill is the earlier stone phase. This is reiterated in Pevsner, which principally refers to the early C19th phase. The stone phase is constructed with chisel faced stone blocks. The windows have plain ashlar sills, arches and architraves and incorporate an unusual canted stone hood-moulds, which may suggest a slightly later date, with stone modillioned brackets to the eaves gutter.

Figure 3.10: The southern gable of the early C19th phase



Figure 3.11: The western elevation of the single storey range to the lane



- 3.23 The mill has clearly been subject to deterioration, which has resulted in the loss of elements such as parts of the roof structure. Part of the elevation facing the stream also shows signs of structural instability. The ground floor of the early stone phase has also been subject to adaptation with a series of concrete block walls inserted to sub-divide the space.

Figure 3.12: Roof collapse to the early C19th range
(www.28dayslater.co.uk)

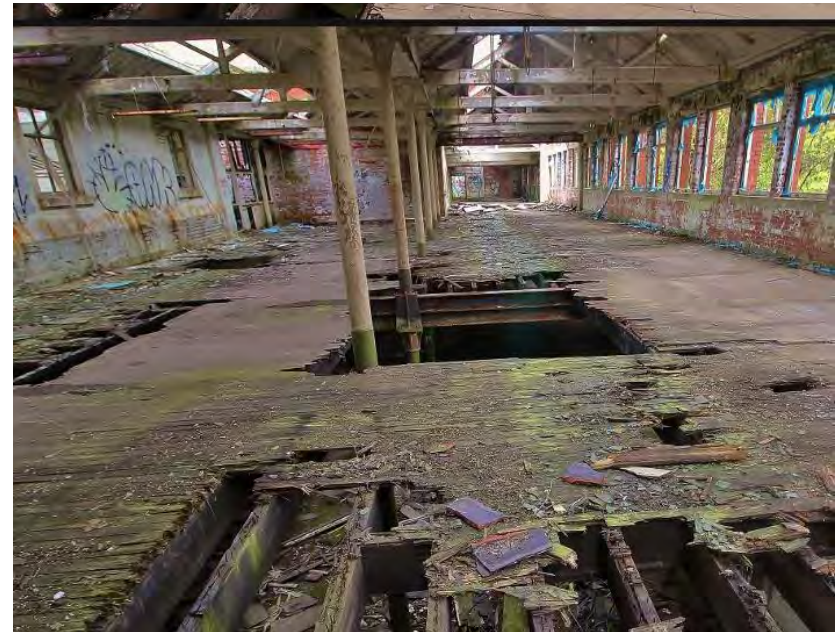


Figure 3.13: Collapsed trusses in the early C19th range
(luigidawn.blogspot.com)



3.24 The late C19th brick range incorporates a single line of iron columns. However, surprisingly for this period the floor does not appear to comprise a fire-proof construction.

Figure 3.14: The interior of the late C19th brick phase



3.25 The brick phase of the building appears to have been subject to incremental extension between 1910 and 1929 and again between 1929 and 1963. The later phase of extensions included the short range that projects over the brook. The brick phases did not incorporate any significant architectural detailing, for example to the eaves or window openings and the exterior simply incorporates a series of brick piers, a simple concrete coping and simple

concrete forms to the lintels and sills of the windows. The window frames have been lost and the later range has also been subject to adaptation with concrete block walls.

Figure 3.15: The range spanning Dearden Brook (c.1929-63)



- 3.26 Historically, Edenwood Mill has an association with Turnbull and Stockdale Ltd, a company renowned for its block printing, which enjoyed a resurgence during the Arts and Crafts period, and for their high-quality shadow-tissue printing technique (The Beauty of Experiment, Sykas and Belford, 2013).
- 3.27 William Turnbull established his print works in Bury in 1881 and then entered into partnership to form Turnbull and Stockdale Ltd in 1882. The company grew rapidly and in 1896 acquired the Rosebank Printworks and nearby Edenwood Mill.

3.28 The company's association with Edenwood Mill is therefore considerably later than the original stone mill range and also post-dates the initial brick phase that appears to have been constructed by 1893.

3.29 Several studies have been undertaken since the mid 1980s to establish the extent of survival and condition of textile mills in the Greater Manchester area. This work culminated in the Greater Manchester Historic Mills Survey (2017), which was supplemented by the Lancashire Textile Mills Stage 2 Survey and Buildings at Risk Survey (Oxford Archaeology, 2018).

3.30 The Lancashire Textile Mills Buildings at Risk survey was based on site surveys that were conducted in 2012. It identified Edenwood Mill as having 'medium significance' in respect to potential historic value:

"Medium Significance: important at local to borough level, including locally listed buildings; may include altered parts of listed buildings or modern alterations. Buildings should be retained wherever possible."

3.31 The 2012 on-site survey categorised the mill as being in 'very bad' condition, based on the Historic England Buildings at Risk guidance (1998), which defines 'very bad' as follows:

"Very Bad: a building where there has been structural failure, or where there are clear signs of structural instability; (where applicable) there has been loss of significant areas of the roof covering, leading to major deterioration of the interior; or where

there has been a major fire or other disaster affecting most of the building.”

- 3.32 The on-site survey is now eight years out of date and based on current social media images the mill has clearly deteriorated significantly since that survey was undertaken. The Historic England Buildings at Risk methodology does not have a condition category beyond ‘very bad’, however it is clear that the deterioration anticipated due, particularly, to the roof condition in 2012 has been realised, leading to major losses of historic fabric.

The Contribution of Setting and the Appraisal Site to Significance

- 3.33 The most important aspects of the setting of Edenwood Mill are the Dearden Brook and mill pond. The mill was located in an isolated location between Edenfield and the valley floor of the River Irwell apparently to take advantage of the water course of this secondary valley.

Figure 3.16: The mill pond to the north of Edenwood Mill



- 3.34 The setting of Edenwood Mill changed incrementally during the C19th and early C20th, with the gradual development of Edenfield and associated buildings such as the Congregational Church. However, during the late C20th the setting of Edenwood Mill changed markedly with the construction of the M66, associated junction and the viaduct that carries the A56. Residential development has also extended towards the mill from Rosebank. However, the association with the brook and mill pond is still clearly evident.

Summary

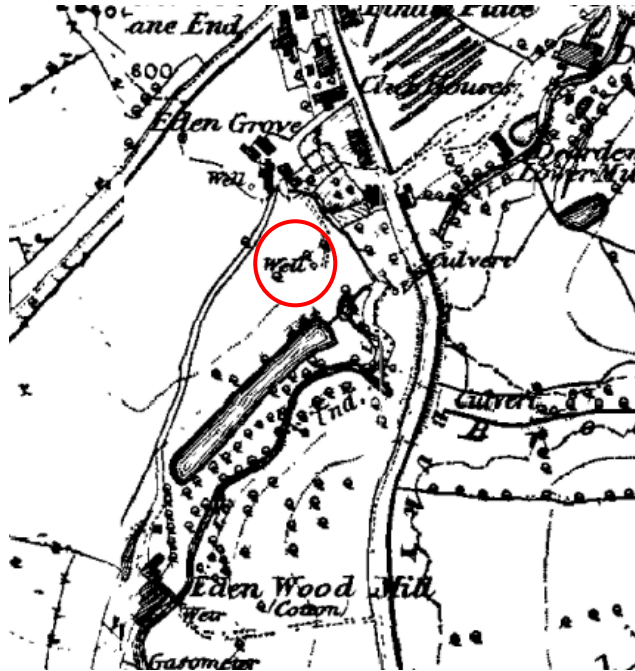
- 3.35 In summary, Edenwood Mill is identified on the HER for the purposes of the NPPF and Historic England guidance regarding non-designated heritage assets. The Lancashire Mills Survey also identified the building as having local to borough level significance.
- 3.36 However, given the chronology of construction, limited interest of the later brick phases and their subsequent extension and adaptation, it is considered that only the early C19th phase, with its stonework construction and detailing, has sufficient ‘heritage value’ to be considered as a non-designated heritage asset for the purposes of the NPPF.

Well (HER Reference: 8329)

Heritage Value

3.37 The HER confirms that the well, located just beyond the northern edge of the proposed allocation site, was illustrated on the first edition Ordnance Survey map of 1851. The HER confirms that the evidence for the structure is 'documentary', suggesting that the record has not been subject to field work.

Figure 3.17: Extract from the 1851 Ordnance Survey Map (PRN 8329 encircled)



3.38 The Ordnance Survey map confirms that two wells were located between 'Eden Grove' and the mill pond and that a further individual well was located within Eden Grove. Later maps, including that of 1893, do not refer to any wells in that area, although the 1963 Ordnance Survey map refers to 'sinks' in a similar location.

3.39 However, the location of the wells, if they still exist, is outside the extent of the proposed allocation, and located adjoining an area of existing development to the north of the mill pond. Therefore, the proposed allocation is considered not to impact on the potential heritage value of the assets if they exist as anything more than an historic record.

4.0 Heritage Considerations

Heritage Value

- 4.1 Rossendale Borough Council has not published a 'local list', however Edenfield Mill is identified on the Lancashire HER, one of the means by which 'non-designated heritage assets' may be identified in accordance with the relevant Historic England guidance.
- 4.2 The HER contains an extract of correspondence from the Borough Council Conservation Officer, in May 2013, which indicates that the significant elements of the building were restricted to the early stone phase rather than the later brick phases of the complex. That seems consistent with the references in Pevsner and the understanding of the building on-site. The correspondence from 2013 also seems to anticipate the removal of the mill.
- 4.3 Since that time, and the on-site survey conducted for the Lancashire Mills Survey (2012), the buildings have clearly deteriorated further. 'State of Repair' is not normally a criterion for assessing significance (for example in the DCMS Principles of Selection for Listing Buildings, 2011). However, there can be no doubt that the rapid deterioration and loss of fabric has eroded the potential architectural value of the building.

Policy Considerations

- 4.4 Paragraph 185 of the NPPF, states that in respect to plan making:

"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) opportunities to draw on the contribution made by the historic environment to the character of a place."*

- 4.5 In respect to proposals affecting heritage assets, paragraph 192 of the NPPF requires that:

"In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;*
- and*

c) the desirability of new development making a positive contribution to local character and distinctiveness.

4.6 In respect to non-designated heritage assets, NPPF paragraph 197 states:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

4.7 In considering the potential viable use of the mill this Heritage Review should be read in conjunction with the following:

- Updated Structural Report (Michael Pooler Associates)
- Viability Appraisal (Nolan Redshaw)
- Planning Report (Roman Summer Associates)

4.8 In this context NPPF paragraph 199 may provide a relevant way forward:

“Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.”

14th April 2020

Turnbull and Stockdale Ltd.



EDENWOOD MILL, EDENFIELD, ROSSENDALE

FLOOD RISK SCOPING AND SUSTAINABLE DRAINAGE STATEMENT

We have undertaken an initial desk-based review of flood risks at the site which encompasses the former Edenwood Mill curtilage in Rossendale. The purpose of this exercise was to identify the primary sources of flood risk both to and from the development onsite. This desk-based assessment has also considered the potential options for managing both surface water and foul water flows should the site be redeveloped for residential purposes. Furthermore, the assessment identifies any development considerations and constraints that are associated with both flood risk and drainage at the site.

SITE CONTEXT & INITIAL CONSULTATIONS

The site comprises of the former Edenwood Mill and its surrounding curtilage, accessed from the A56. The nearest Ordnance Survey National Grid Reference (OS NGR) is E:379761, N:418441 and the nearest postcode is BL0 0LW (see location plan in **Appendix A**). The site neighbours the M66 on its south-eastern boundary and runs beneath Wood Lane (A56) to the north. The development parcel is illustrated by the indicative red edge in **Figure 1** on the subsequent page.

The site currently consists of low to high-density vegetation, trees and shrubbery located adjacent to the boundaries and the Main River (Dearden Brook) that crosses the site in multiple locations. Dearden Brook is also understood to be culverted in sections through and adjacent to the site boundaries. Except for the derelict façade of the former Edenwood Mill building most of the site is undeveloped and consists of undeveloped areas. There are also multiple ponds, sluices and weirs running adjacent to the Main River as a result of the former land-use on the site.

The existing access is from Wood Lane to the north, however the site slopes quickly down towards the former Mill building and the adjacent watercourse which was previously used by the Mill for daily activities. A full topographic survey has been provided (included within **Appendix B**) and shows that the site falls from its north/north-western boundaries at a level of 171.0mAOD to 162.0mAOD, down towards the Main River where levels range from 154.0mAOD to 151.0mAOD.

Initial consultations with the Environment Agency (EA), United Utilities (UU), Lancashire County Council (LCC) and Rossendale Borough Council (RBC) have been carried out to ascertain whether there are any historical records of flooding at the site. Consultations responses RBC, the EA and UU thus far, all of which confirm that they held no historical records of flooding at the development site. These consultations have been used to support this assessment and can be seen in **Appendix C, D** and **E**. A response from LCC has not been received, but this is often the case given that LLC typically consider these requests as pre-application advice, thus a charged service to provide a response.



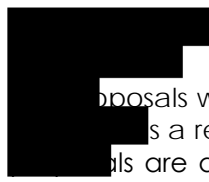


Figure 1: Site Location and Features (Betts Hydro, 2020)

DEVELOPMENT PROPOSALS

At this time the planning layout is being developed and not available for inclusion. The purpose of this exercise was to identify the potential flood risks to site and in turn any development considerations that must be made to accommodate those risks. Furthermore, this initial assessment was to enable a sustainable means of managing both foul and surface water flows (that would be generated by any future development) to be identified. This early consideration ensures that sustainable drainage systems can be allowed for within the initial concept designs.





Proposals will be residential in nature and given the proximity of the Main River to the sites a requirement to consider flood risk and other development constraints as the sites are developed. Residential dwellings are classified as 'More Vulnerable' within the Planning Practice Guidance. Planning guidance notes that certain development types are only suitable for locating within high flood risk areas if there is enough justification and the development can be safeguarded for its design life. The subsequent sections will briefly consider the flood risks identified and any required mitigation measures, along with identifying any development considerations as a result.

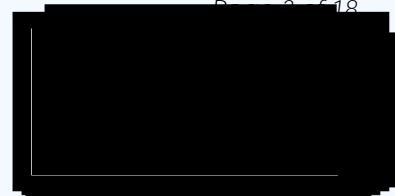
FLOOD RISK SUMMARY

This section will summarise the key findings of the initial review, this is not a detailed Flood Risk Assessment (FRA) but an initial desk-based exercise to determine flood risks and potential mitigation measures which might impact upon the development proposals or initial design works. An initial review of the flood mapping datasets has been undertaken to identify the key development considerations; these will need to be considered in more detail as part of any future FRA. **Table 1** below provides a summary.

Table 1: Key Flood Sources and Level of Risk (Betts Hydro, 2020)

| SOURCE OF POTENTIAL FLOOD RISK | RISK RATING | COMMENT |
|--|--------------------|---|
| Tidal | Low | The open coast is located 45km west of the site and the Ribble Estuary is over 40km to the north-west of the site. The potential flood risks to the site directly from tidal sources is low. |
| Fluvial Main Rivers Ordinary Watercourses Land Drainage Features | Low, Medium & High | The nearest Main River (Dearden Brook) is a tributary of the River Irwell which runs adjacent to the wider site next to the old Edenwood Mill building. This watercourse flows into the Irwell less than 500m to the south-west of the site. There are multiple culverts, ponds, weirs and sluices associated with Dearden Brook including features that are located within the wider site extents. Due to the proximity of these watercourse features to the site, there is shown to be some flood risks associated within the wider site extent. Based on the National Flood Mapping, the majority of site is shown to be at little risk from fluvial flooding, although those areas directly adjacent to the existing watercourse are shown to be at medium to high risk. The degree and scale of flood risks will be discussed subsequently, although fluvial flood risks at the sites are considered to pose the primary threat to the proposals. |
| Groundwater | Low | Based on the general mapping, the site is underlain by a Secondary A bedrock Aquifer with Secondary (undifferentiated) superficial deposits. The site is also located within a medium to low Groundwater Vulnerability Zone. No records of historic flooding at the site due to groundwater has been identified during consultations therefore the risk from groundwater flooding is low. |

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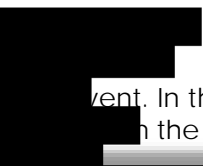
| SOURCE OF POTENTIAL FLOOD RISK | | RISK RATING | COMMENT |
|--------------------------------|------------|----------------------|---|
| Surface Water / Pluvial | | ● Low, Medium & High | The National Flood Mapping shows most of the site is not at risk from surface water flooding. The low-lying river corridor on the eastern boundary is however shown be varied risk from surface water flooding, form very low to high. This mapping is generalised and applies direct rainfall to the highest locations within a catchment to show where at rainfall (run-off) would direct and convey in a variety of scenarios. Mapping extracts have been appended to this summary note (Appendix C) and overlaid onto the topographic survey for context. The potential flood risks from surface water/pluvial flooding will need to be considered in more detail as part of a full FRA in due course. |
| Artificial Sources | Reservoirs | ● Medium | The National Flood Mapping shows that part of the site is also at risk from reservoir flooding should a breach or failure occur in any of the nearest reservoir(s). This is due to the low-lying river corridor that is present within the site which will act as a conduit during a potential breach event. Although, the likelihood of a breach occurring is very low (due to regular maintenance and regulatory inspections), the low-lying areas would potentially be susceptible to flood depths between 0.3m and 2m. The potential flood risks and any required mitigation will need to be considered as part of a full FRA. |
| | Canals | ● Low | The site is located more than 10km from the nearest three canals (Rochdale Canal to the south-east, Manchester Bolton and Bury disused canal to the south-west and the Leeds and Liverpool Canal to the north). There is no potential flood risk to the site from canals, due to the proximity from site. |
| | Sewers | ● Low | There are public sewers shown to cross the site, however consultation with United Utilities have not identified any historic records of sewer flooding onsite or within the vicinity. |

Based on this initial data review, the primary sources of flood risk to the development site are from fluvial, surface water and reservoir flooding, as summarised above. The potential flood risk from these sources will be considered in more detail as part of a full Flood Risk Assessment. The following section will focus on the primary flood risks that require mitigation to be implemented to ensure the residential proposals remain safe for their design life.

Fluvial Flood Risks

Information relating to flood risk has been obtained from the Environment Agency (EA) and from the Gov.uk website. The EA's Flood Zone Map for Planning confirms that the site is located within Flood Zones 1, 2 and 3 (appended in **Appendix C**). The Shapefiles have been obtained from the government website and overlaid with the site geography to create an overlay plan; an extract is shown within **Figure 2**. Flood Zone 1 is an area considered to be at little or no flood risk from fluvial or tidal sources. Food Zone 2 is an area at 'low' to 'medium' risk of flooding from fluvial/tidal sources in the undefended 1 in 1000yr return period event. Flood Zone 3 is an area considered at 'medium' to 'high' flood risk from rivers and/or the sea in the undefended 1 in 100yr fluvial return period event or the undefended 1 in 200yr





ent. In this case, given the site proximity from the coast it is understood that the risk in the fluvial scenario.



Figure 2: Flood Zone Overlay Plan (Betts Hydro, 2020)

Given the location of Dearden Brook, one of the primary sources of flood risk to the development is fluvial. As noted previously the site is mostly at no risk from fluvial flooding and those areas that are shown to be at risk are located within or directly adjacent to



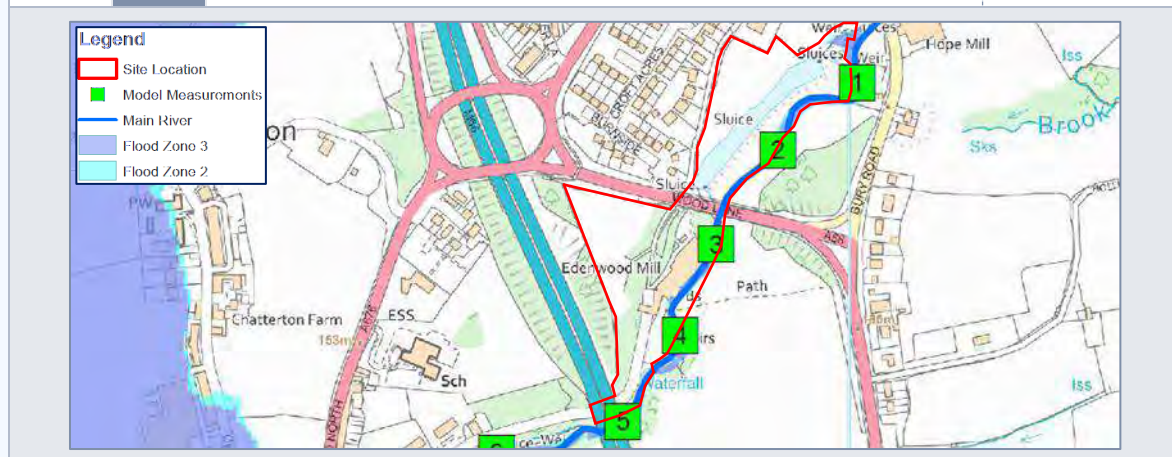


Dearden Brook where it flows in proximity of the site. The EA has been consulted in order to get a better understanding of the potential flood risk at the site and they provided the following in-channel top water levels for Dearden Brook (see **Table 2** below).

The predicted flood water levels are based on the modelling works carried out as part of the Dearden Brook 2009 Model Study which considers the undefended scenarios (as there are no key flood risk defence infrastructure in the vicinity of the site). The modelling as noted in **Table 2**, has considered various return period events for the fluvial scenarios, including two allowances for Climate Change (CC) which confirm to the new requirements for modelling climate change impacts. No water levels are available within the site itself but as the site is close to and in some cases includes the main channel, it is acceptable to use the in-channel top water levels, which are confirmed to be the most up-to-date, to assess the flood risk at this early stage (full data included in **Appendix C**).

Table 2: Model data taken from Dearden Brook 2009 Study (EA, 2020)

| MAP REFERENCE | MODELLED UNDEFENDED RETURN PERIOD EVENT(S) | MODELLED UNDEFENDED RETURN PERIOD EVENT(S) | | | | | MITIGATION Minimum Finished Floor Level (FFL) |
|---------------|--|--|---------------------|------------------------------|------------------------------|------------------------|--|
| | | 5% AEP (1 in 20yr) | 1% AEP (1 in 100yr) | 1% AEP (1 in 100yr) + 35% CC | 1% AEP (1 in 100yr) + 70% CC | 0.1% AEP (1 in 1000yr) | |
| 1 | MODELLED WATER LEVEL (MAOD) | 160.34 | 160.43 | 160.56 | 160.66 | 160.61 | 161.16 |
| 2 | | 158.22 | 158.82 | 159.33 | 159.62 | 159.26 | 159.93 |
| 3 | | 155.06 | 155.25 | 155.51 | 155.74 | 155.63 | 156.11 |
| 4 | | 152.80 | 152.96 | 153.14 | 153.30 | 153.25 | 153.74 |
| 5 | | 144.96 | 145.10 | 145.27 | 145.41 | 145.35 | 145.87 |



EA Data Review

The EA have provided the water level information for the design events including the 1 in 100yr, 1 in 100yr plus Climate Change (CC) and the 1 in 1000yr return period events. In terms of CC, the EA have considered both a 35% increase in flow and 70% increase in flow in accordance with the current guidelines for CC modelling. Given the modelling data

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ed by the EA and the existing ground levels onsite, the site is potentially at risk in all scenarios to varying degree. The predicted top water levels will vary at each node and as there are 6no. nodes in proximity of the site, this section will consider an those nodes that are directly adjacent to surveyed areas of the site (Nodes 2, 3 and 4).

In terms of the upstream Node (2) the existing ground levels nearby are at the lowest approximately 158.2mAOD. When the predicted Top Water Levels (TWLs) are compared to the existing ground levels there is the potential for out of channel flooding to occur. Although flooding is likely to occur in all events, this will be contained within the immediate area as ground levels rise quickly from the top of bank into the main development area, which will minimise the potential for flooding to the main development area. Furthermore, the Environment Agency require an 8m offset to be included from the watercourse top of bank into the site. This offset area also provides an opportunity for the development to be further offset from the potential flood risks associated with Dearden Brook.



Figure 3: Northern Floodplain Overlay Plan showing 8m offset (Betts Hydro, 2020)

An indicative 8m offset line (purple dashed line) has been illustrated on the Flood Zone Overlay plan based on the underlying topographic survey as illustrated in **Figure 3**. This shows that the extents of the out of channel flooding associated with the 1 in 100yr (Flood Zone 3) and the 1 in 1000yr (Flood Zone 2) return period events do not extend past the required offset (purple line shown in **Figure 3**). The Environment Agency have also provided

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the modelled floodplain extents for the 1 in 100yr plus Climate Change based on up to date modelling, this is represented by the lighter blue extent shown in Figure 4 on the previous page. The predicted floodplain extents do not extend past the proposed offset from the watercourse and therefore providing the watercourse offset is incorporated into the planning proposals the proposed residential development will not be located within those parts of the wider site that would be prone to some flooding in the extreme events.

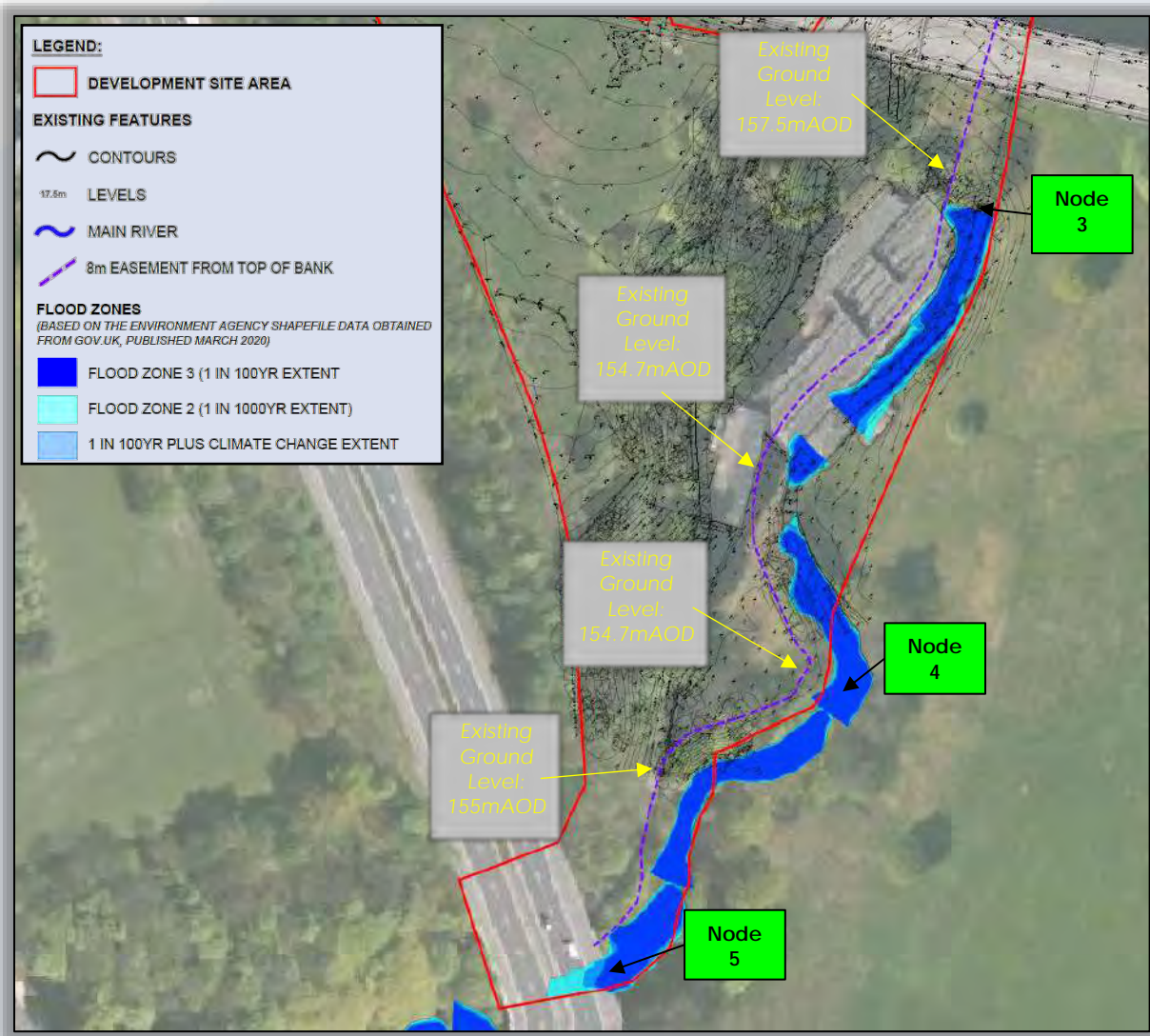
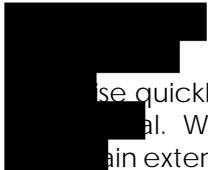


Figure 4: Southern Floodplain Overlay Plan showing 8m offset (Betts Hydro, 2020)

When the other watercourse nodes adjacent to the site are considered the same can be said. When the TWLs from Node No.3 are compared to the existing ground levels the potential flooding would mostly remain in channel for up to and including the 1 in 100yr return period event (see Figure 4 for floodplain extents. Some minor out of channel flooding would occur like with the upstream nodes in the more extreme events, although as ground




 se quickly from the top of bank, the actual extent of out of channel flooding would be minimal. When the 8m offset from the watercourse is considered, the predicted main extents for the key events are again shown to be contained within this designated offset area (see **Figure 4**) meaning there would be no flooding to the proposed residential areas providing the 8m offset is incorporated into the planning layout.




In terms of the downstream Node (No. 4), the existing ground levels nearby are at the lowest approximately 154.4mAOD. When the TWLs in channel are compared to the existing ground levels on the site there is no flooding within the main development area in any of the return period events. Furthermore, when the existing ground levels near to the extent of the 8m offset are considered, the ground levels raise to 154.7mAOD and as shown in **Figure 4** there is no predicted flooding outside of the 8m offset extents in the range of events considered.

As the topographic survey does not extend to Node Location 1 (upstream of site) or Node 5 (downstream), a levels comparison for these nodes cannot be undertaken. It is assumed however, given the similarities between the findings at Nodes 2,3 and 4 that these off-survey locations would follow a similar approach, this is illustrated better in **Figures 3 and 4** where the extents of flooding is not shown to extend into the site past the proposed 8m offset from the watercourse banks (centerline).

Safeguarding Future Development

As discussed previously, the PPG identifies that certain types of development would not be acceptable if located in high risk areas, unless they can be safeguarded for their design life. In terms of planning policy, there will be a requirement to ensure safeguarding new development considers the potential impacts of climate change. The typical requirement for residential development is to ensure it remains flood free for the design event which should include allowance for Climate Change. Normally, the proposed finished floor levels would be raised 600mm above the predicted onsite top water levels in the design event.

The design event for residential development is typically the 1 in 100yr plus 35% climate change event for areas primarily at risk from fluvial sources that are not considered to be particularly sensitive. In terms of Finished floor levels these would typically be raised 600mm above the predicted top water level in the design event. If we reconsider the three nodes looked at previously and apply a 600m to the predicted TWLs it will give a steer as to the potential design criteria for future residential proposals across the site.

-  In the upstream part of site (Node 2), the TWL in the 1 in 100yr plus 35% CC event is 159.33mAOD and when a 600mm freeboard is applied this gives a finished floor level of the site to be 159.93mAOD.
-  In the central part of the site (Node 3), the TWL in the 1 in 100yr plus 35% CC event is 155.51mAOD and when a 600mm freeboard is applied this gives a finished floor level in this part of the site to be approximately 156.11mAOD.
-  Finally, for the downstream areas (Node 4), the TWL in the 1 in 100yr plus 35% CC event is 153.14mAOD and when a 600mm freeboard is applied this gives a finished floor level in this part of the site to be 153.74mAOD.





The Policy states that levels raising within Flood Zone 3 would need to be supported by that flood risk elsewhere would not increase. If raising levels here to safeguard the development results in any increase in flood risk elsewhere then there is a requirement to provide compensatory flood storage. Compensation can only be provided in areas that are not currently located in the Flood Zone 3 extent. It would therefore be recommended that the planning layout steer the main development away from the river corridor and the neighboring Flood Zone 3 extents. Where levels raising on the site is required Flood Zone 3 then there is a requirement to consider the compensatory floodplain storage. Providing the 8m offset is incorporated into the planning layout, then the proposed development would not be located within Flood Zone 3 extents.

Furthermore, pre-application conversations with the Environment Agency can be carried out should the client wish to get agreement on proposals prior to submission of any subsequent planning proposals.

Surface Water Flood Risks

The site is also shown to be susceptible to other flood risk sources including surface water or pluvial flows. Surface water flooding occurs when rainwater is unable to drain away through the normal drainage systems or soak into the ground but lies on or flows over the ground instead. Most of the site is at none or very little risk from surface water flooding based on the national flood risk modelling datasets.

There are some areas that are at medium to high flood risk particularly along the eastern site boundary (see **Figure 5**). Those areas on site at highest risk are also shown on the topographic survey to correspond with the naturally low-lying areas associated with Dearden Brook. These low-lying areas would be susceptible to ponding in the extreme and prolonged rainfall events as the surrounding ground levels are elevated in comparison, natural conveyance in the downstream system may be limited due to natural capacity.

The surface water flood risk mapping is indicative of locations onsite where natural flow or conveyance routes would be present, these natural features need to be considered within the wider development proposals. The long-term flood risk mapping provide on the government data website shows that the site would be susceptible to between 300-900mm of surface water flooding in those areas at medium risk. Depths would be less in those areas at low risk and greater in those areas at highest risk. Due to the existing ground levels through the site the predicted surface water flood velocities onsite are more than 0.25m/s. These depths and velocities need to be considered when a proposed planning layout is being developed, as any natural flow routes must be carefully controlled and safe continued avenues of flow, must be provided.

The risks associated with surface water can be mitigated for through appropriate levels design and provision of space for water within the planning proposals. **Figure 5** therefore shows where the areas onsite at highest risk of surface water flooding would occur by overlaying the governments surface water flood risk map and the topographic survey to help steer the future proposals on the site. The potential flood risk will be considered further as part of a full Flood Risk Assessment.



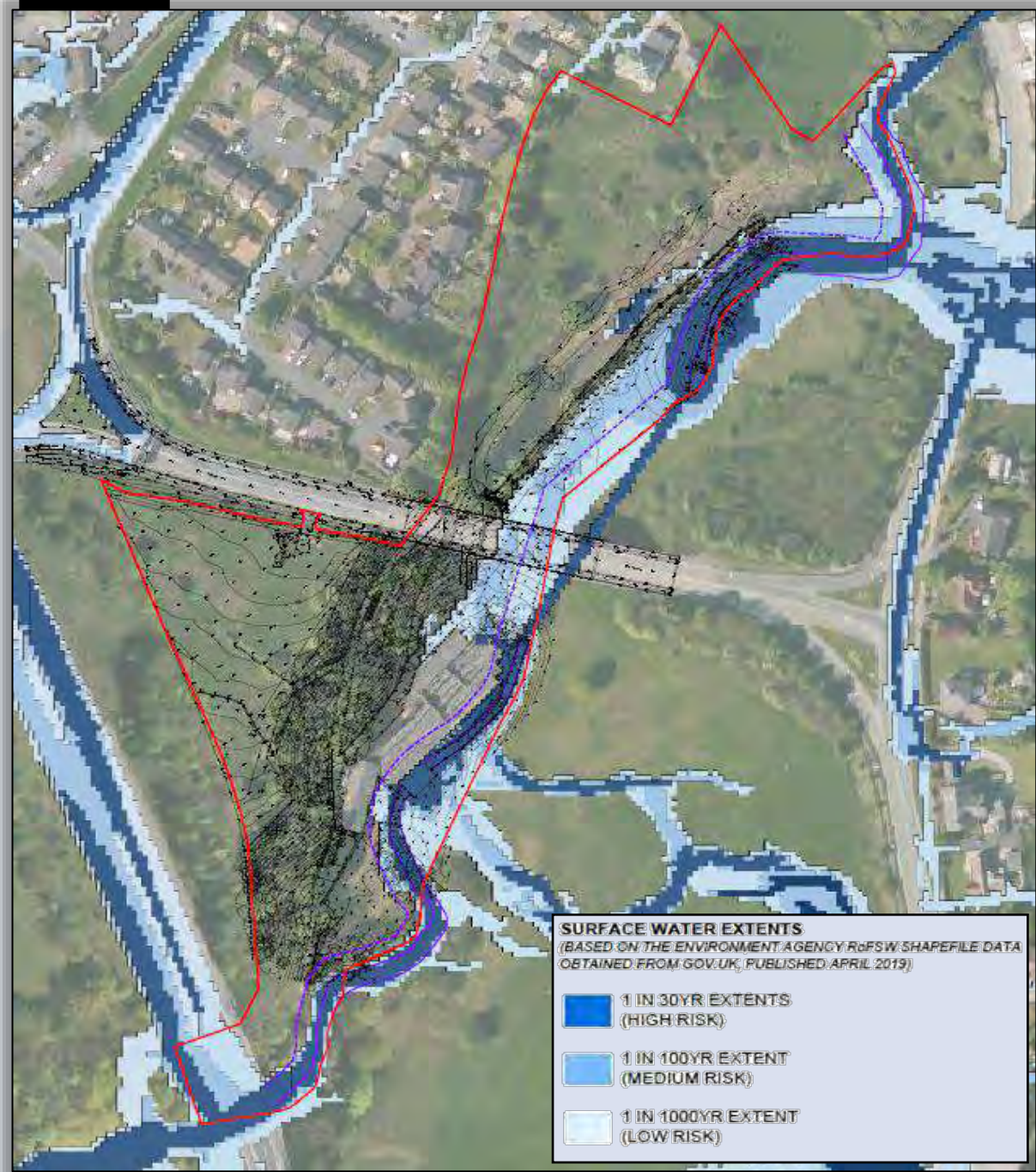


Figure 5: Surface Water Flood Risk Map Overlay (Betts Hydro, 2020)

Development Constraints & Considerations

Dearden Brook is located within the site and based on the current mapping this watercourse is currently shown to have out of channel flooding in some of the modelled events, thus meaning the extents of Flood Zone 2 and 3 encroach out of channel in some locations.





residential development is proposed within Flood Zone 3 there is a requirement for a Flood Risk Assessment Test to be undertaken by an appropriately qualified professional. Furthermore, residential development is proposed within Flood Zone 2, there is a need for the planning application to be supported by a Sequential Test that has considered the identified flood risks. In the case of the site, the majority is located within Flood Zone 1 and residential would be acceptable here subject to any mitigation measures required to ensure it remains safe for its design life. Any residential development being proposed should adopt an intra-sequential approach be steered to those areas within the site that are at least flood risk (Flood Zone 1). If residential development was to be proposed within Flood Zone 2 or 3 then the planning tests noted above would need to be applied.

There will be a requirement to ensure safeguarding new development and the typical requirement for residential development is to ensure it remains flood free for the design event which should include allowance for Climate Change. Normally, the proposed finished floor levels would be raised 600mm above the predicted onsite top water levels in the 1 in 100yr plus 35% climate change. As the predicted water levels vary along the watercourse route and the site is bordered by a long stretch of the watercourse the finished floor levels will vary depending on the dwelling's location in relation to the watercourse route. Based on the information considered within this assessment the minimum finished floor level for development proposed in the northern part of site will be 159.93m AOD. As we move to the central part of site (near the existing Mill building) the finished floor level would be 156.11m AOD and in the southern part of the site the finished floor level will be 153.74m AOD.

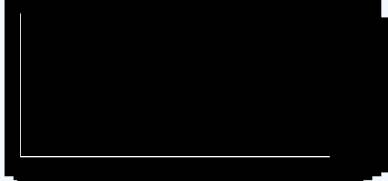
Flood resilience measures can also be considered as safeguarding measures in part and can be built into new development to provide valuable property level resilience. Measures include raising electricals and utilities above the ground floor level, using water compatible materials for flooring at ground floor level, horizontal plaster boards rather than vertical (to allow for easier replacement) and the use of non-return flap valves on external incoming drainage runs. These will be considered in more detail in due course as the design is finalised.

In terms of this Dearden Brook, the Environment Agency will require an 8m no build offset to be included into any future planning proposals to allow for any future required maintenance of this watercourse by them. The 8m offset should provide clear, unimpeded access meaning no building, fence line, boundary walls or privately owner areas can be located within 8m of the top of bank into the site. An indicative offset line is shown on the Flood Zone overlay Plan based on the estimated Top of Bank illustrated on the topographical survey for the site, see **Appendix C**).

As noted, the UU public combined sewer crossed the development site and United Utilities will require this asset to be accounted for within any planning layout, diversion may be possible subject to early discussion with UU. Where diversion is not practical then any proposed planning layout will need to allow for an offset from the centreline of the sewer on both sides. Early discussion with UU is recommended as the offset/easement can vary depending on asset depth and size.

Blue/green corridors should be incorporated within the design for the site to account for any natural flood flow or conveyance routes associated with surface water/ pluvial flood risks to allow flows to continue as they exist at present. Alternatively, any natural flows through the

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need to be intercepted and conveyed through the development proposals to their fall locations.

There is an existing Mill Pond present on the site and currently little information is present for the nature and function that this feature currently plays in flood management for the surroundings areas. The proposals will be to shorten this mill pond where possible to account for the development in this part of the site. Further investigation of the inlets and outlets of this existing feature will be required to understand whether it can be shortened and the best mechanisms to carry this work out. Furthermore, early discussion will be needed with the Environment Agency to ascertain whether this former Mill Pond is now used within the catchment for any flood management benefit. Consent for changes to the Mill pond may also be required from the Lead Local Flood Authority therefore discussion early in the design process would be recommended to identify any constraints for future development.

Given the vulnerability, any subsequent planning application for residential development at the site will need to be supported by a full Flood Risk Assessment which considers the potential risks and identifies mitigation that will safeguard the proposals for their lifetime, considering Climate Change. It is also recommended that early discussion and/or pre-application advice is undertaken with the Environment Agency to identify any potential constraints with the proposals.

SURFACE WATER MANAGEMENT

The following section will look at the potential surface water management options, this is not a detailed drainage design, but a strategic overview of the opportunities based on sustainable drainage hierarchy. In terms of surface water management, national and local planning policies identify that surface water run-off generated by new development is required to be managed in an appropriate and sustainable way.

Existing Drainage Situation

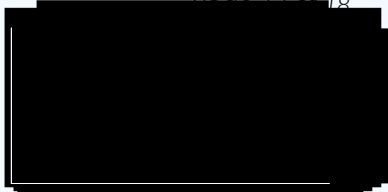
This section will consider how the site currently manages surface water/pluvial run-off, this is a desk-based assessment only, based on the available information and is a desk-based assessment only. At present most of the site is undeveloped and therefore permeable, there is some impermeable areas remaining from its former use as a mill, including the main façade adjacent to the watercourse. The pluvial run-off generated on the undeveloped areas would typically discharge to ground over time in low-lying areas, however given the falls across the site it is more likely that flows from most rainfall events naturally convey with the topography toward Dearden Brook on the south/south-eastern boundaries.

The mill and surrounding hardstanding areas would have historically discharge run-off to Dearden Brook given its location. Given that most of the mill and surrounding hardstanding has become derelict and unusable, it is assumed that any previous drainage systems would not likely be fully functioning. During extreme and prolonged rainfall events/occasions where existing systems are exceeded, there is again the potential for overland flow to direct any excess run-off naturally towards the watercourse.

Pre-Development Run-off Rates

Based on the total site area being 3.150ha, the pre-development greenfield rate (QBar) is calculated to be 55.5l/s using the FEH Statistical Method (see calculations summary in

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...dix F). This equates to 17.6l/s/ha. The peak rates and volumes of run-off generated by ... at present have been calculated for the peak events using the FEH Statistical ..., as shown in **Table 3**.

Table 3: Pre-Development Run-Off Rates based on Greenfield Scenario (Betts Hydro, 2020)

| Site Area | Run-Off Rates | | | | Run-Off Volumes | |
|-----------|---------------|--------------|---------------|---------|-----------------|---------------|
| | 1 In 1 Year | 1 In 30 Year | 1 In 100 Year | QBar | 1 In 1 Year | 1 In 100 Year |
| 3.150ha | 48.3l/s | 94.3l/s | 115.4l/s | 55.5l/s | 524.3cu.m | 1308.1cu.m |

Proposed Drainage Strategy

In accordance with the SuDS Manual (CIRIA 753) and the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015), states surface water run-off generated by new development should discharge firstly to ground (via infiltration) to minimise discharge to downstream watercourses and sewers. Where infiltration is not practical or viable, discharge to a watercourse system should be considered. Finally, where the first two means of managing surface water have been explored and are evidenced as not feasible, surface water run-off can, subject to agreements, discharge into a suitable sewer network.

This section will consider the options for surface water management assessed in accordance with the sustainable drainage hierarchy: discharging to ground, to a watercourse or finally to the public sewer network in that order of priority. A Drainage Opportunities Plan has been prepared (extract in **Figure 6**) which illustrates these options (see full plan in **Appendix G**).

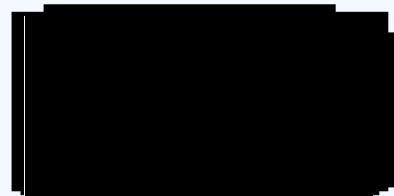
Discharge to Ground

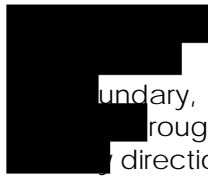
The sustainable drainage hierarchy notes the primary means of managing surface water is to discharge to ground (infiltrate) where ground conditions allow. The online published geology data identifies the soils in the region to be made up of slowly permeable, seasonally wet loamy and clayey soils. The underlying bedrock is made up of mudstones and siltstones with Devensian tills at superficial level. Based on the published datasets, it is unlikely that infiltration onsite will provide a feasible drainage solution, based on impermeable nature of the underlying strata. The soil factor for the area has also been identified to be 0.5 (based on the FEH catchment data), which suggest the soils in the region are not porous (based on a scale of 0.1 to 0.5, with 0.5 being impermeable).

Based on the ground conditions identified by the published online datasets, infiltration would not be considered a feasible option for managing surface water run-off generated by future development. To confirm the specific infiltration rates, further investigation in the form of Soakaway Testing (to BRE365) may need to be commissioned prior to detailed drainage design once planning approval is granted in due course.

Discharge to a Watercourse

Given that infiltration is unlikely to provide a feasible option for managing surface water run-off, we have considered the alternatives. The next option in the sustainable drainage hierarchy should be to discharge surface water run-off to a nearby watercourse or waterbody. The nearest watercourse is Dearden Brook, which flows adjacent to the eastern



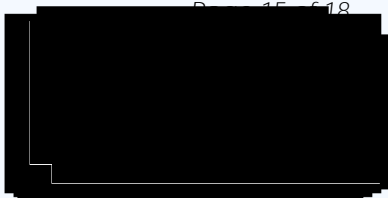


boundary, Dearden Brook is understood to be both open channel and culverted in rough and adjacent to the site boundaries. The watercourse flows in a south-direction to outfall into the River Irwell less than 500m from the site boundary.

In terms of this Dearden Brook, the EA will require an 8m no build offset to be included into any future planning proposals to allow for any future required maintenance of this watercourse by them. The 8m offset should provide clear, unimpeded access meaning no building, fence line, boundary walls or privately owner areas can be located within 8m of the top of bank into the site. An indicative offset line is shown on the Floodplain Overlay Plan based on the features identified in the topographical survey, see **Appendix B**).



Figure 6: Proposed Drainage Strategy Plan (Betts Hydro, 2020)



Proposals for surface water management at the site will be to mimic the pre-development situation and discharge surface water run-off at a restricted rate to the course which runs through the site, as illustrated within **Figure 6**. Subject to consent and detailed design. Restricting the rate will generate a requirement to provide onsite attenuation, the specifics of which will be determined during detailed design in due course.

Detailed design will need to refine the strategy, based on engineering constraints and layout changes. It is likely that a gravity solution will be possible given the current falls across the site, but this will be confirmed during the next stage, as the planning layout is developed. Consent for works to the Main River network including new outfalls or changes to the existing channels/culverted lengths will be required from the Environment Agency in the form of an Environmental Permit. Early discussion would also be recommended with the Lead Local Flood Authority (Lancashire County Council) who are responsible for agreeing discharge rates from new development to waterbodies.

Proposed Rates of Discharge

In terms of surface water proposals, policy states that new development should consider minimising the surface water run-off generated by impermeable areas and restricting run-off from new development to mimic a pre-development greenfield equivalent where at all practical. Based on the total site area of 3.150ha, the pre-development greenfield rate (QBar) is calculated to be 55.5l/s this is derived based on 17.6l/s/ha as calculated using the FEH Statistical Method (see calculations summary in **Appendix F**).

As the proposals would be to restrict surface water run-off to mimic a pre-development greenfield situation, there will be a requirement to provide onsite surface water attenuation to ensure no increased risk to others results from the proposals to increase impermeable area. The stormwater storage figures quoted in **Table 4** are estimates only, based on the available information, this will be refined in due course as part of the full assessment once a layout is developed. It has been assumed that post-development impermeable areas will increase to 50% of the total site area, to calculate the stormwater storage requirements.

Table 4: Estimated Stormwater Storage Requirements (Betts Hydro, 2020)

| Post-Development Impermeable Area (1.575ha) | 1 In 1 Yr Event | 1 In 30 Yr Event | 1 In 100 Yr Event + 40% CC |
|---|-----------------|------------------|----------------------------|
| Restricted Run-Off Rate | 55.5l/s | 55.5l/s | 55.5l/s |
| Estimated Storage Volume | 50cu.m-144cu.m | 251cu.m-410cu.m | 597cu.m-885cu.m |

The overall the surface water drainage regime will need to be designed to manage the run-off generated in the storm events up to and including the 1 in 100-year return period event with 40% allowance for climate change. It would be beneficial to implement SuDS features including Swales, ponds, permeable surfaces and bio-filtration where at all feasible to reduce the volume of run-off generated by the proposals and provide benefits in terms of conveyance and attenuation. Detailed design will need to consider SuDS in more detail once the final layout is fixed and drainage routing can be considered given the constraints in terms of existing assets on the site.



Discharge to Public Sewer Asset

Utilities (UU) sewer records identify the nearest public sewer assets to be the combined sewer that runs through the development site from Wood Lane to the north, down to Rosebank in the south-western corner (see sewer records in **Appendix D**). Given the proximity of the watercourse there are no proposals at this time to discharge surface water run-off generated by the development to the public sewer network. Should discharge to the watercourse not be feasible then there may be scope to outfall some surface water to the public sewer network, subject to discussion with UU prior. It is likely that any discharge to the public sewer would need to be significantly reduced compare to the current proposals and there would be an inherit increase in required onsite attenuation. As noted, the UU public combined sewer crossed the development site and United Utilities will require this asset to be accounted for within any planning layout, diversion may be possible subject to early discussion with UU. Where diversion is not practical then any proposed planning layout will need to allow for an offset from the centreline of the sewer on both sides. Early discussion with UU is recommended as the offset/easement can vary depending on asset depth and size.

FOUL WATER MANAGEMENT

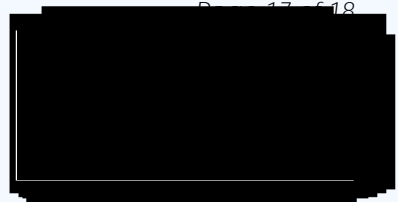
This scoping letter has also considered the potential opportunities for dealing with foul water flows generated by the future development. As noted previously the nearest public sewer assets to be the public combined sewer that runs through the development site from Wood Lane to the north, down to Rosebank in the south-western corner (see sewer records in **Appendix D**). Give the location of the public sewer asset within the site curtilage the proposals for foul water management will be to connect flows generated by the new development into the pubic combined sewer. There may be existing connections present from the former Mill building, however these have not been confirmed and are unlikely to be suitable to serve the entire new development being proposed give the scale.

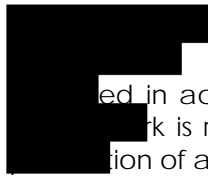
Detailed design will be required to confirm feasibility of the strategy and to confirm whether a full gravity connection can be achieved however, based on the existing ground levels it is assumed that this will be possible. Any proposed rates of discharge will need to conform to the guidance contained within Sewers for Adoption (based on 4000 litres per dwelling per 24 hours). Discussion with UU will identify any mor stringent design criteria upon consultation. Detailed design will need to consider the existing UU sewer (its depths and location) where it crosses the potential route of any plot drainage or internal proposed connections. It may be that multiple connections are required to serve the proposed development to limit the depth on the proposed drainage system. A pre-development enquiry, for agreement in principle with UU, can be undertaken at a later stage to confirm if this strategy would be feasible once a planning layout is available.

CONCLUSIONS

This Flood Risk and Sustainable Drainage Strategy Statement has identified the key considerations in terms of flood risk and drainage at the site. The findings of this desk-based exercise are that the potential flood risks are either very low or can be sufficiently catered for through the implementation of mitigation measures including appropriate spatial planning within the layout. The incorporation of a sustainable and appropriate surface water and foul water management regime for any future development can also be

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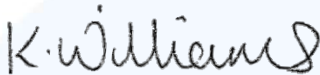




ed in accordance with planning policy. This summary also identifies areas where
 work is required to accommodate the future planning application, including the
 tion of a full Flood Risk Assessment in due course to support the proposals.

I trust that the above information summarises the flood risk and drainage considerations at the site and illustrates that the site can be residentially developed providing appropriate design and mitigation is implemented to safeguard against the primary risks identified. If you have any further queries or require further information, please do not hesitate to contact us.

Yours sincerely



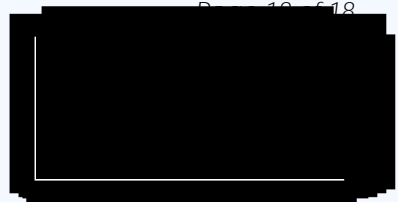
Kirsty Williams BSc(Hons) GradCIWEM
 Flood Risk Analyst

BETTS HYDRO

Attached:

- Appendix A – Location Plan*
- Appendix B – Topographic Survey*
- Appendix C – EA Correspondence & Data*
- Appendix D – United Utilities Correspondence & Data*
- Appendix E – Lancashire County Council and Rossendale Borough Council Correspondence & Data*
- Appendix F – Surface Water Calculations and Quick Storage Estimates*
- Appendix G – Drainage Opportunities Plan*

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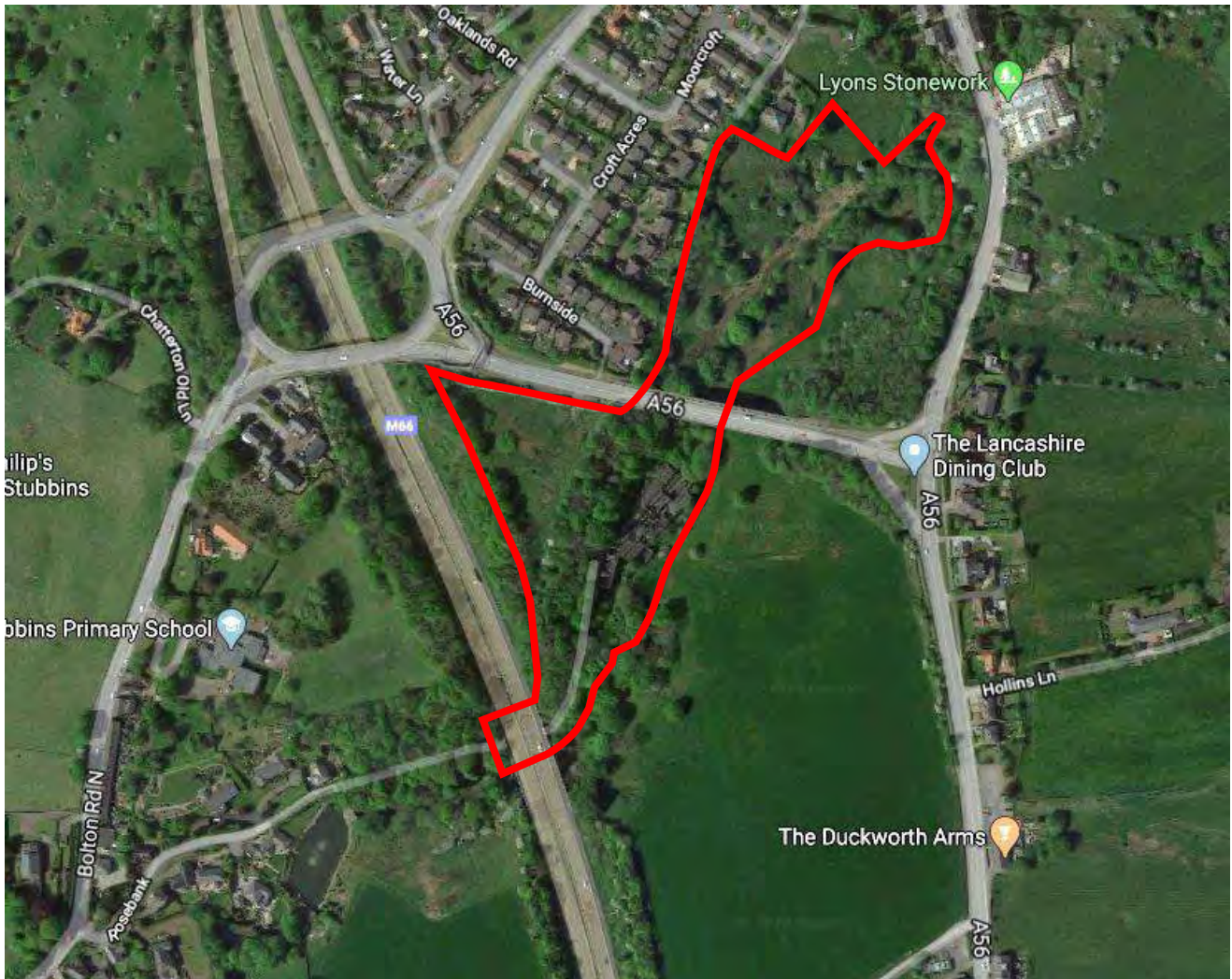
APPENDIX A – LOCATION PLAN

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LOCATION PLAN

Edenwood Mill, Edenfield, Rossendale



| | |
|-------------------|-------------------------|
| OS X (Eastings) | 379761 |
| OS Y (Northings) | 418441 |
| Nearest Post Code | BL0 0LW |
| Lat (WGS84) | N53:39:43 (53.662059) |
| Long (WGS84) | W2:18:28 (-2.307751) |
| Lat, Long | 53.662059, -2.307751 |
| Nat Grid | SD797184 / SD7976118441 |
| mX | -256897 |
| mY | 7071967 |



APPENDIX B – TOPOGRAPHIC SURVEY

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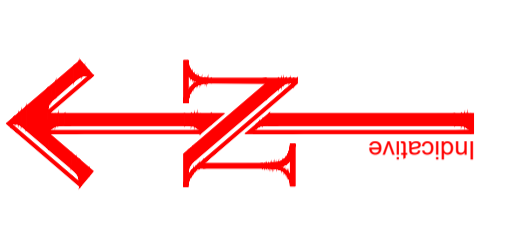
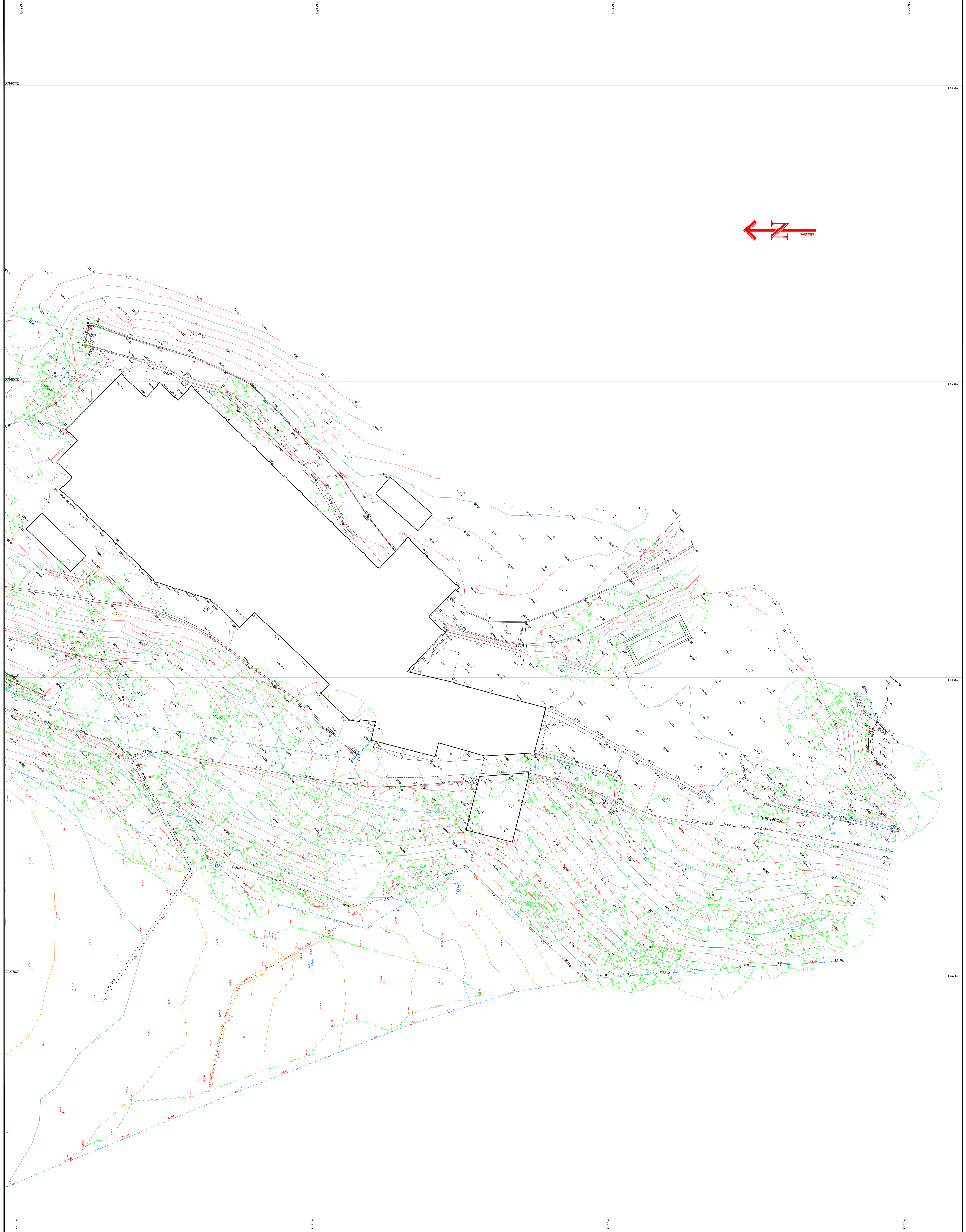
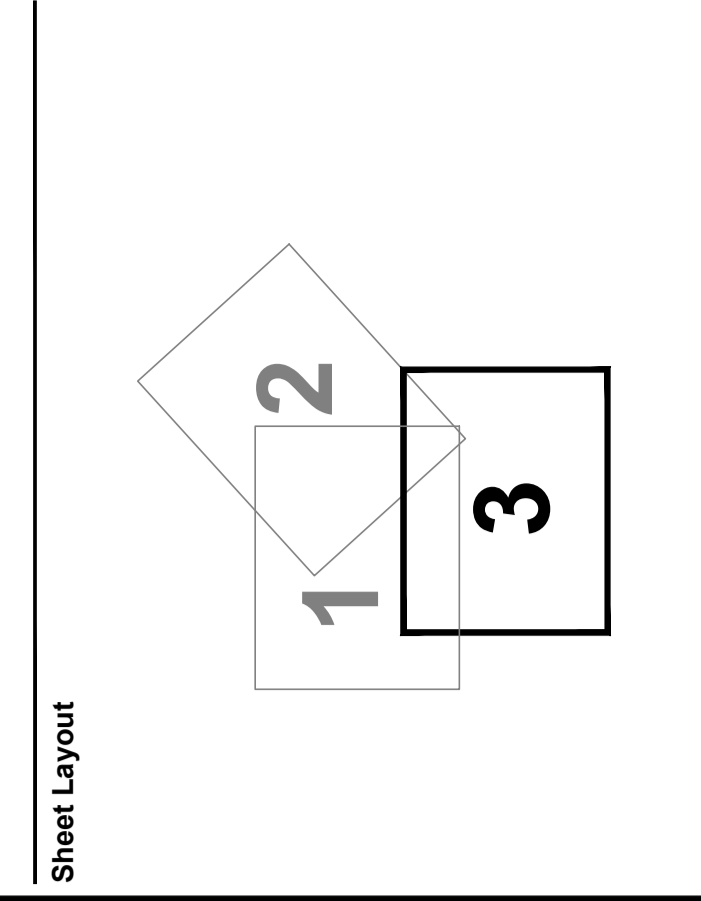


Topographical Survey Legend

- 1. Boundary Lines
- 2. Fences
- 3. Buildings
- 4. Roads
- 5. Paths
- 6. Drainage
- 7. Contours
- 8. Trees
- 9. Spot Heights
- 10. Bench Marks
- 11. Level Pegs
- 12. Survey Station
- 13. Obstacles
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Survey Station Coordinates

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| 0002 | 379779.68 | 418665.52 | 156.38 |
| 0003 | 379779.68 | 418665.52 | 156.38 |
| 0004 | 379779.68 | 418665.52 | 156.38 |
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Topographical Survey
Wood Lane
Ramsbottom
BLO 0EX

Scale: 1:200
 0 5 10 15 20 meters

Coordinates are related to National Grid (OSGB 36)

Levelled by: [Name]
 Date: [Date]
 Project No: [Number]
 Drawing No: [Number]

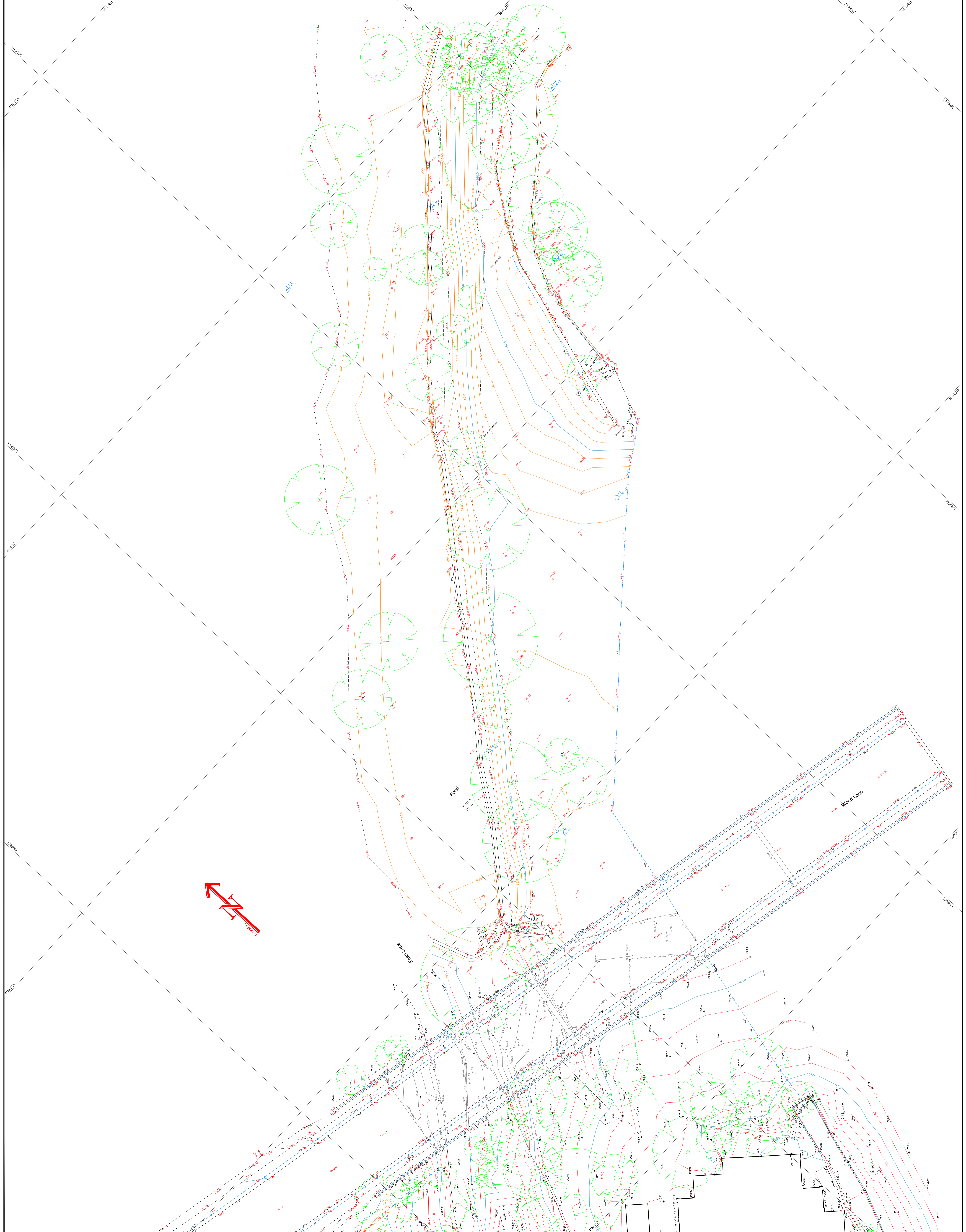
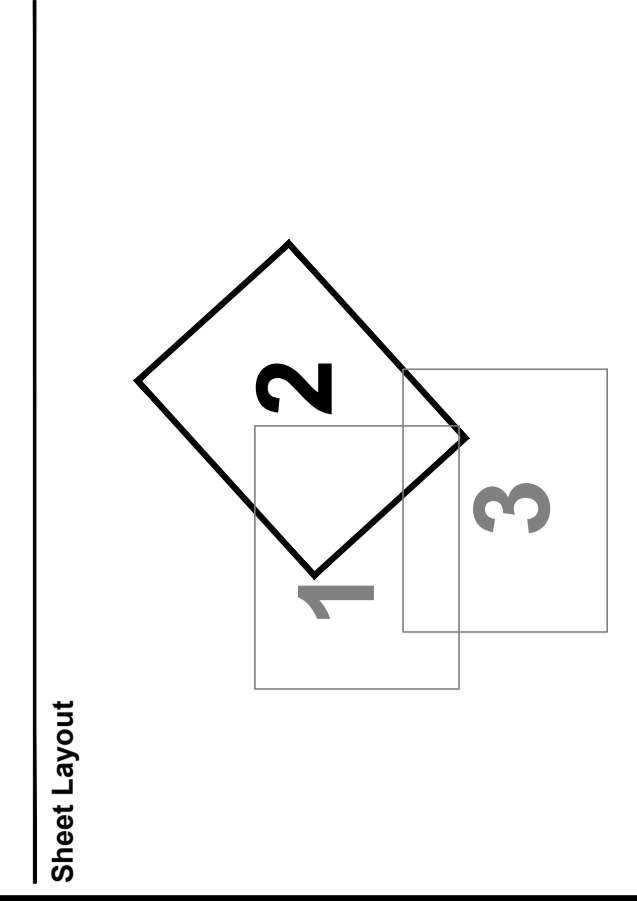
© Registered in England No. 1576624
SURVEYSYSTEMS
 100, The Quadrant, Belper, Derby, DE9 1JH
 Tel: 01773 834444
 Fax: 01773 834444
 Email: sales@surveysystems.co.uk
 Website: www.surveysystems.co.uk

Topographical Survey Legend

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| 99 | Boundary |
| 100 | Boundary |

Survey Station Coordinates

| Sta | Easting | Northing | Level |
|------|-----------|-----------|--------|
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 www.surveysystems.co.uk

Topographical Survey
Wood Lane
Ramshott
BLO 0EX

Client: **North Wessex Limited**
 Date: **05/07/20**
 Drawing: **7653B.200.2.3**
 Scale: **1:200**
 Project No: **7653B.200.2.3**
 Sheet No: **1**

Leveling is related to OSGB 36
 Values in m

Coordinates are related to National Grid (OSGB 36)

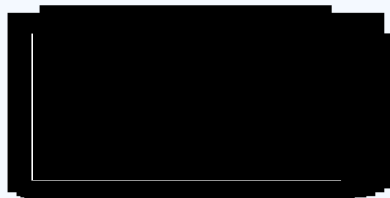
Scale: 1:200
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 Metres

Notes:
 1. All measurements are taken from the datum of the Ordnance Survey Mean Sea Level (MSL) unless otherwise stated.
 2. All measurements are taken from the datum of the Ordnance Survey Mean Sea Level (MSL) unless otherwise stated.
 3. All measurements are taken from the datum of the Ordnance Survey Mean Sea Level (MSL) unless otherwise stated.
 4. All measurements are taken from the datum of the Ordnance Survey Mean Sea Level (MSL) unless otherwise stated.
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 7. All measurements are taken from the datum of the Ordnance Survey Mean Sea Level (MSL) unless otherwise stated.
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 9. All measurements are taken from the datum of the Ordnance Survey Mean Sea Level (MSL) unless otherwise stated.
 10. All measurements are taken from the datum of the Ordnance Survey Mean Sea Level (MSL) unless otherwise stated.



APPENDIX C – EA CORRESPONDENCE & DATA

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[REDACTED]

[REDACTED]

[REDACTED]

13 March 2020 14:01

To: 'CMBLNC Info Requests'
Subject: Product 4,5,6 & 7
Attachments: LOCATION PLAN.pdf

F.A.O Flood Risk, Drainage and/or Planning department

To whom it may concern

Edenwood Mill, Rossendale

Please could you confirm whether you have any information that you feel would be valuable to a Flood Risk Assessment and Drainage Management Strategy for the site above (see location plan attached), including details of historical sewer flooding; this would be greatly appreciated. If there are any specific requirements that you require in a scope of works for this site please can you advise at this stage so that it can be fully incorporated into the proposals at an early stage.

Please do not hesitate to contact me on the details below to discuss further should you require additional information or clarification.

Kind Regards

[REDACTED] (Hons) GradCIWEM
Graduate Flood Risk Analyst

BETTS HYDRO
Consulting Engineers

Old Marsh Farm Barns, Welsh Road, Sealand, Flintshire, CH5 2LY

[REDACTED]
www.betts-associates.co.uk

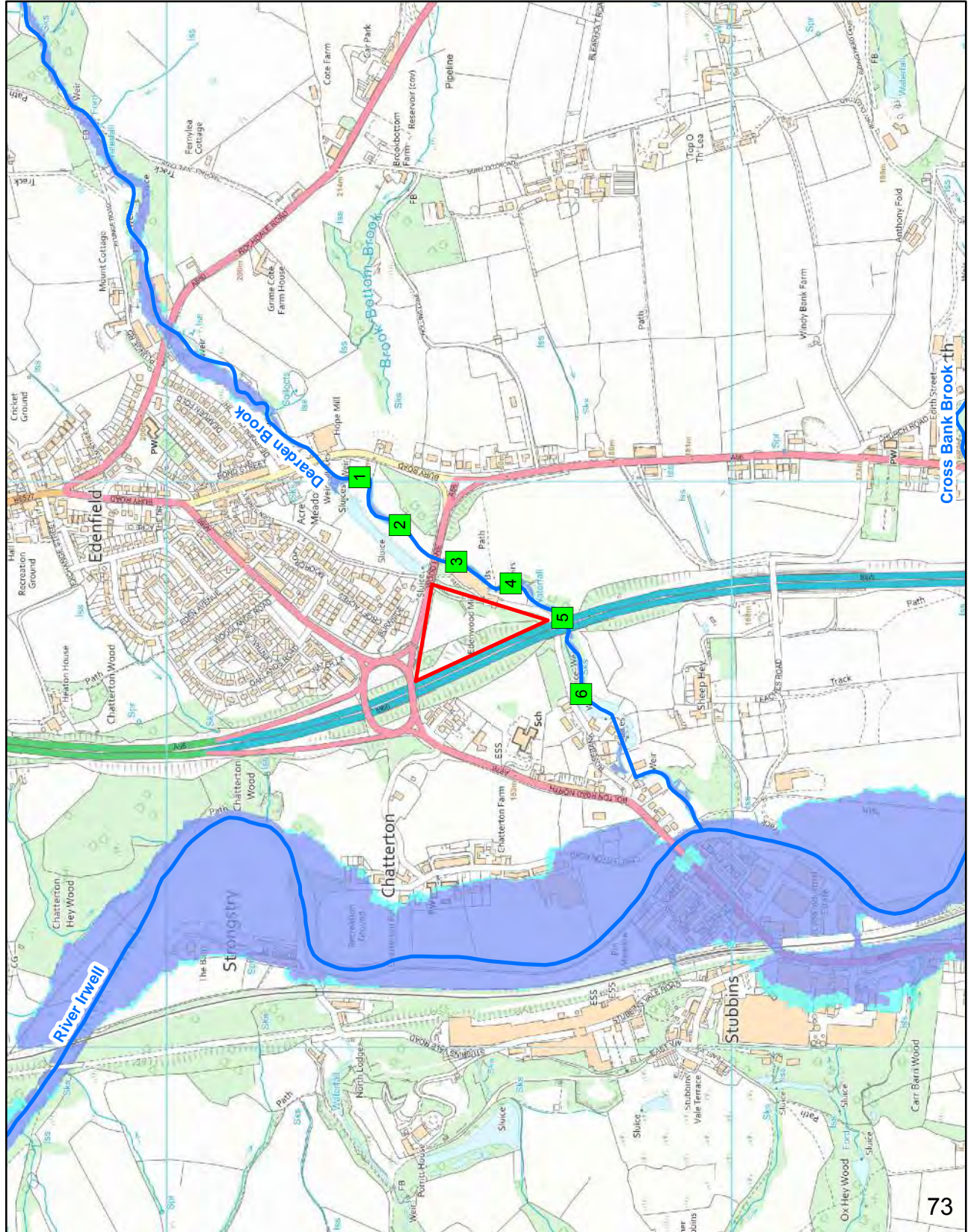
CIVIL | STRUCTURAL | GEO-ENVIRONMENTAL | HYDROLOGY | FLOOD RISK MANAGEMENT
SUDS | STRUCTURAL SURVEYS | PARTY WALL DUTIES | INFILTRATION | GEOTECHNICAL

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Detailed Flood Map centred on Edenwood Mill, Rossendale, BL0 0LW. Created on 19/03/2020 [GMMC165579CC]



1:10,001

N

Legend

- Site Location
- Model Measurements
- Main River
- Flood Zone 3
- Flood Zone 2

| Map Reference | Model Node Reference | Easting | Northing | Data | Undertended | | | | |
|---------------|--------------------------|---------|----------|---|------------------------|-------------------------|--|--|----------------------------|
| | | | | | 5 % AEP (1 in 20 year) | 1 % AEP (1 in 100 year) | 1 % AEP (1 in 100 year) + 35% increase in flow | 1 % AEP (1 in 100 year) + 70% increase in flow | 0.1 % AEP (1 in 1000 year) |
| 1 | ea013_Model_DEAD01_0691n | 380007 | 418658 | Modelled Water Level (m aodN) Modelled Flow (cumecs) | 160.34 5.41 | 160.43 7.38 | 160.56 9.97 | 160.66 12.55 | 160.61 11.25 |
| 2 | ea013_Model_DEAD01_0857 | 379924 | 418587 | Modelled Water Level (m aodN) Modelled Flow (cumecs) | 158.22 8.23 | 158.82 11.23 | 159.33 15.15 | 159.62 19.08 | 159.26 17.15 |
| 3 | ea013_Model_DEAD01_0732 | 379857 | 418485 | Modelled Water Level (m aodN) Modelled Flow (cumecs) | 155.06 8.23 | 155.25 11.23 | 155.51 15.15 | 155.74 19.08 | 155.63 17.15 |
| 4 | ea013_Model_DEAD01_0614 | 379819 | 418391 | Modelled Water Level (m aodN) Modelled Flow (cumecs) | 152.80 9.38 | 152.86 12.73 | 153.14 17.17 | 153.30 21.63 | 153.25 19.45 |
| 5 | ea013_Model_DEAD01_0608n | 379756 | 418297 | Modelled Water Level (m aodN) Modelled Flow (cumecs) | 144.96 9.39 | 145.10 12.73 | 145.27 17.17 | 145.41 21.62 | 145.35 19.45 |
| 6 | ea013_Model_DEAD01_0351 | 379622 | 418267 | Modelled Water Level (m aodN) Modelled Flow (cumecs) | 136.74 9.38 | 136.91 12.73 | 137.24 17.17 | 137.48 21.62 | 137.36 19.45 |

Model data taken from Deardon Brook 2009 Study

AEP - Annual Exceedence Probability

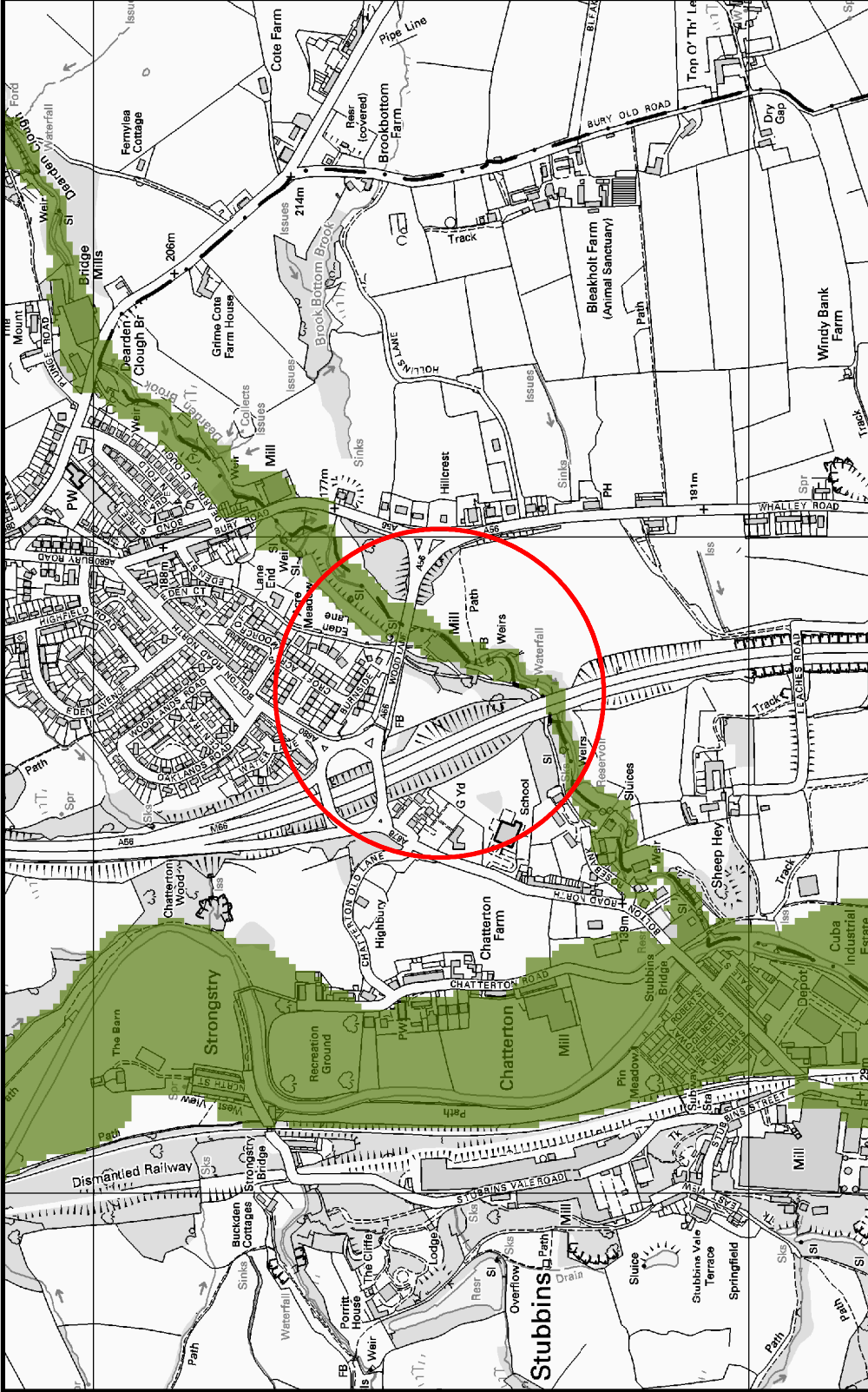
m aodN - metres above ordnance datum Newlyn

cumecs - cubic metres per second

Notes:

*Climate Change Scenario - 35% and 70% increases in flow calculated for the 2080's (2070 - 2115). Please see <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> for more information regarding the new climate change guidance. The location of the site and the type (vulnerability) of development determine the climate change allowances to consider in any flood risk assessment.

Reservoir Flood Map



The area within the red circle could be at risk of flooding from the following reservoirs:

| Reservoir Name | Reservoir Owner | Location | Local Authority | Environment Agency Office |
|----------------|----------------------------|----------------|-----------------|--|
| Scout Moor | United Utilities Water plc | 382540, 419670 | Lancashire | Environment Agency - Greater Manchester, Merseysid |

Note - this map provides a general indication of the largest area that might be flooded if a reservoir were to fail and release the water it holds. It is taken from a national assessment and displays a worst case scenario. The map is only intended as a guide and is not a prediction of what will happen.

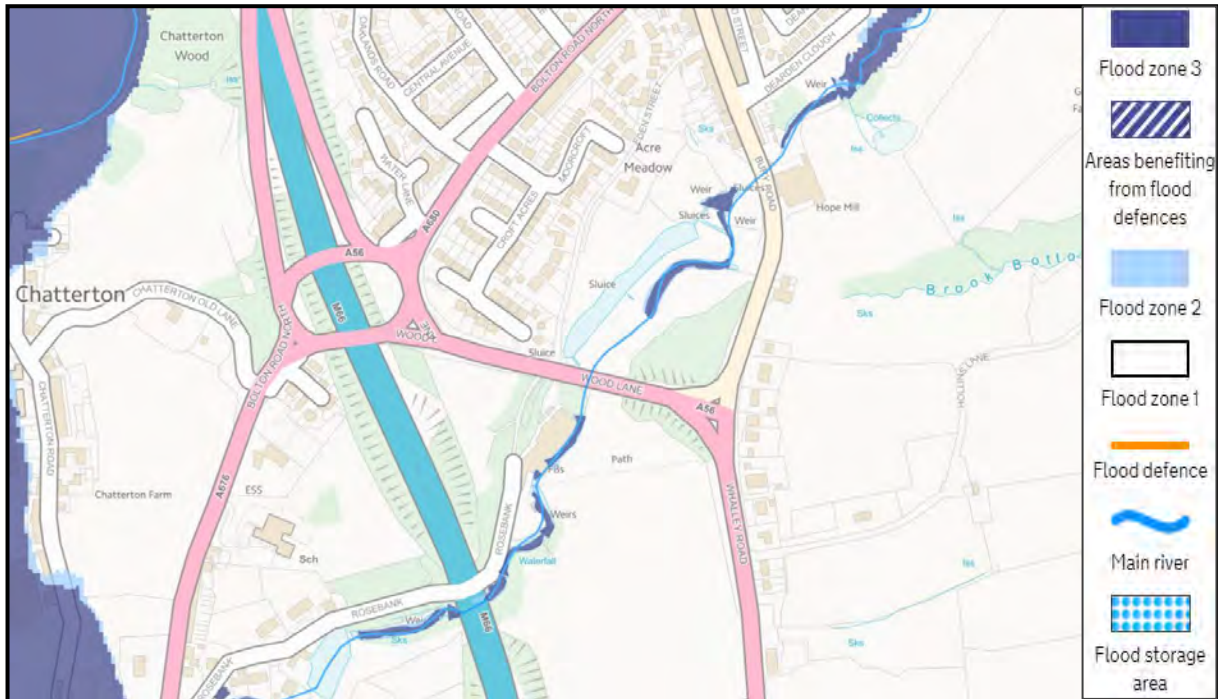
Important

- This map has been produced for emergency planning purposes and displays a worst case scenario.
- It is not suitable for use at an individual property scale due to the method used.
- This map does not give any information on the likelihood of reservoir flooding or on the depth or speed of floodwaters. It also does not include any smaller reservoirs (which hold less than 25,000 cubic metres of water) or reservoirs commissioned or registered after Spring 2009.
- The information should not be interpreted as stating that the location you are interested in will or won't actually flood, but simply that it is in or not in an area that could be affected by reservoir flooding as shown on the maps.

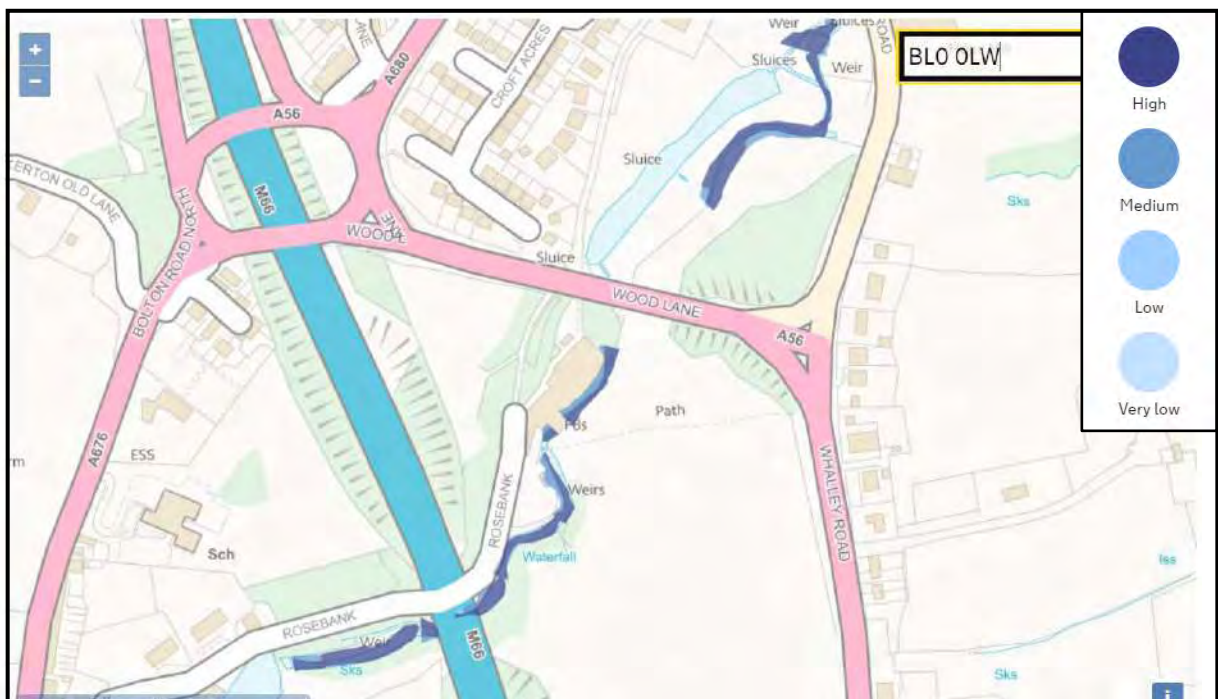
Maximum extent of flood

1:10,000

Flood Map for Planning



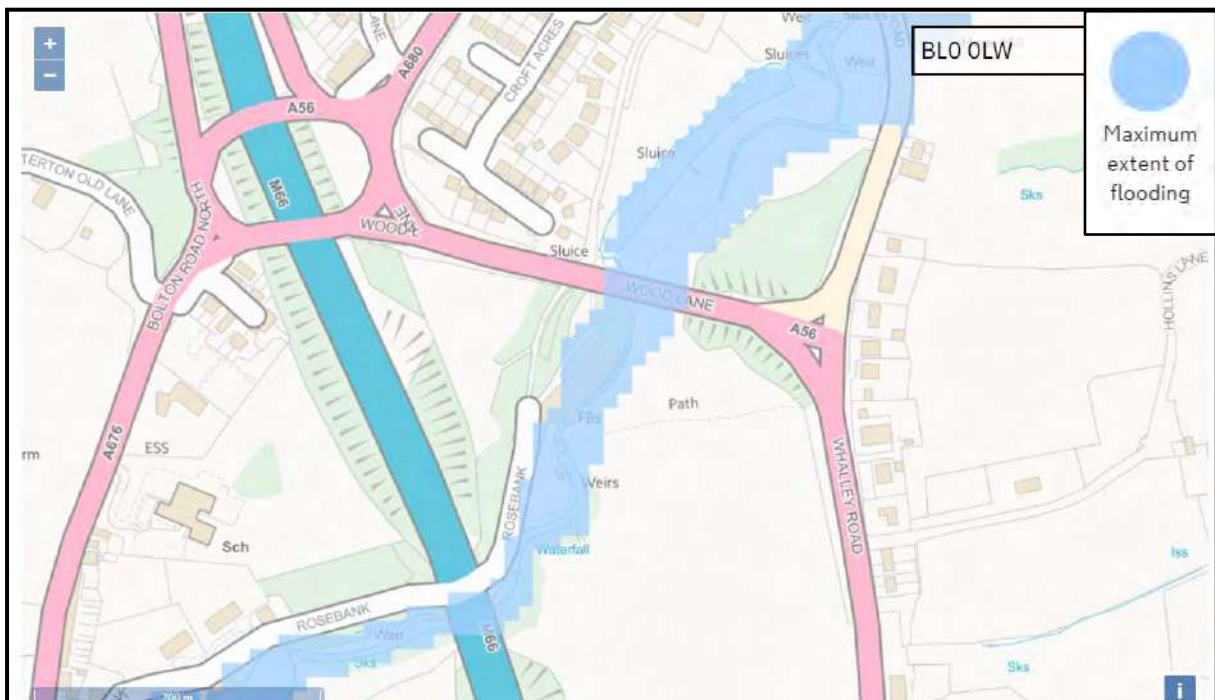
Long Term Flood Risk - Rivers or Sea



Long Term Flood Risk - Surface Water



Long Term Flood Risk - Reservoirs



DO NOT SCALE

LEGEND:

- DEVELOPMENT SITE AREA
- EXISTING FEATURES
- CONTOURS
- LEVELS
- MAIN RIVER
- 8m EASEMENT FROM TOP OF BANK

FLOOD ZONES
FROM GOV.UK PUBLISHED MARCH 2020

- FLOOD ZONE 3 (1 IN 100YR EXTENT)
- FLOOD ZONE 2 (1 IN 100YR EXTENT)
- 1 IN 100YR PLUS CLIMATE CHANGE EXTENT

REVISED TO SCHEMATIC COMMENTS

| NO | DATE | BY | DESCRIPTION | STATUS |
|-----|------------|----|-------------------------------|------------|
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| 84 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 85 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 86 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 87 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 88 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 89 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 90 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 91 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 92 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 93 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 94 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 95 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 96 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 97 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 98 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 99 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |
| 100 | 11/04/2020 | AW | ISSUED FOR SCHEMATIC COMMENTS | FOR REVIEW |

PRELIMINARY

BETTS HYDRO CONSULTING ENGINEERS
Unit 4, Old Works Farm Bury, Walk Road, Bury, Greater Manchester, M9 2JY
 Tel: 0161 254 2821

TURNBULL AND STOCKDALE LTD

**EDENWOOD MILL
RAMSBOTTOM, BURY**

**FLOODPLAIN OVERLAY PLAN
(BASED ON THE MARCH 2020 EA DATA)**

DATE: 11/04/2020
 DRAWN BY: AW
 CHECKED BY: AW
 PROJECT NO: HYD510
 DRAWING NO: 100
 REV: C





DO NOT SCALE

- LEGEND:**
- DEVELOPMENT SITE AREA
 - EXISTING FEATURES
 - CONTOURS
 - LEVELS
 - MAIN RIVER
 - 1 IN 30YR EXTENT (HIGH RISK)
 - 1 IN 100YR EXTENT (MEDIUM RISK)
 - 1 IN 1000YR EXTENT (LOW RISK)

SURFACE WATER EXTENTS
 BASED ON THE ENVIRONMENTAL AGENCY'S RAINFALL SHAPFALE DATA
 OBTAINED FROM GOV.UK, PUBLISHED APRIL 2019.

| NO. | DATE | BY | DESCRIPTION | RISK |
|-----|----------|-----|------------------------|------|
| A. | 01.04.20 | ADP | PRELIMINARY FOR REVIEW | OK |

BETTS HYDRO
 CONSULTING ENGINEERS

Unit 4, Old Works Farm Bury, West Road, Bury, Greater Manchester, M9 2JY
 Tel: 0161 254 2821 | www.betts-hydro.co.uk

CLIENT: **TURNBULL AND STOCKDALE LTD**

PROJECT: **EDENWOOD MILL
 RAMSBOTTOM, BURY**

TITLE: **SURFACE WATER FLOOD RISK MAP
 (BASED ON THE MARCH 2020 EA DATA)**

| | | | |
|---------------------|--------------------|----------------|-------------|
| DATE: 01 APRIL 2020 | SCALE: 1:2500 @ A0 | DRAWN: OK | CHECKED: OK |
| PROJECT NO: HYD510 | REVISION NO: 101 | DATE: 01/04/20 | BY: B |

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APPENDIX D – UNITED UTILITIES CORRESPONDENCE & DATA

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[REDACTED]

[REDACTED]

16 March 2020 10:34

To:

[REDACTED] Risk

Hi

'I can confirm that we have no current record of sewer flooding on our DG5 register within the vicinity of the proposed development. The DG5 register is a register of properties that have flooded as a result of hydraulic inadequacy of the public sewer network.

Please note that United Utilities Water Limited (Uuw) can only record and check flooding events which are reported to us and we have to comply with our Regulators instructions on the qualification of flooding events to place on the register.

Our response does not include:

- *any sewer flooding events caused by blockages or collapses which are the result of third party actions, natural events or other actions over which Uuw has no control and not a facet of sewer capacity; or*
- *any historical sewer flooding events that have been removed from the register as a result of investment in our infrastructure.*

As with all development sites, we recommend you liaise with our water and wastewater engineers by contacting our Developer Services team so the details of your development proposal can be considered further. Details can be found at the following link.

<https://www.unitedutilities.com/services/builders-developers/>

Should you require any further information please do not hesitate to contact me.'

Please find enclosed our response

Thanks sue



If you have received a great service today why not tell us?

Visit: [unitedutilities.com/wow](https://www.unitedutilities.com/wow)



Visit: <https://unitedutilities.thewowawards.co.uk/nominate>

Please note that as from the 1 April 2019 the fee for the administration of a Building Over Agreement will be £139.00 (this fee is none vatable) <http://www.unitedutilities.com/build-over-sewer.aspx>).

Please send postal applications to the following address:

[Redacted address line 1]

[Redacted address line 2] result in delays in your application.

From: [Redacted]

[Redacted]

Subject: Sewer Flood Risk

F.A.O Flood Risk, Drainage and/or Planning department

To whom it may concern

Edenwood Mill, Rossendale

Please could you confirm whether you have any information that you feel would be valuable to a Flood Risk Assessment and Drainage Management Strategy for the site above (see location plan attached), including details of historical sewer flooding; this would be greatly appreciated. If there are any specific requirements that you require in a scope of works for this site please can you advise at this stage so that it can be fully incorporated into the proposals at an early stage.

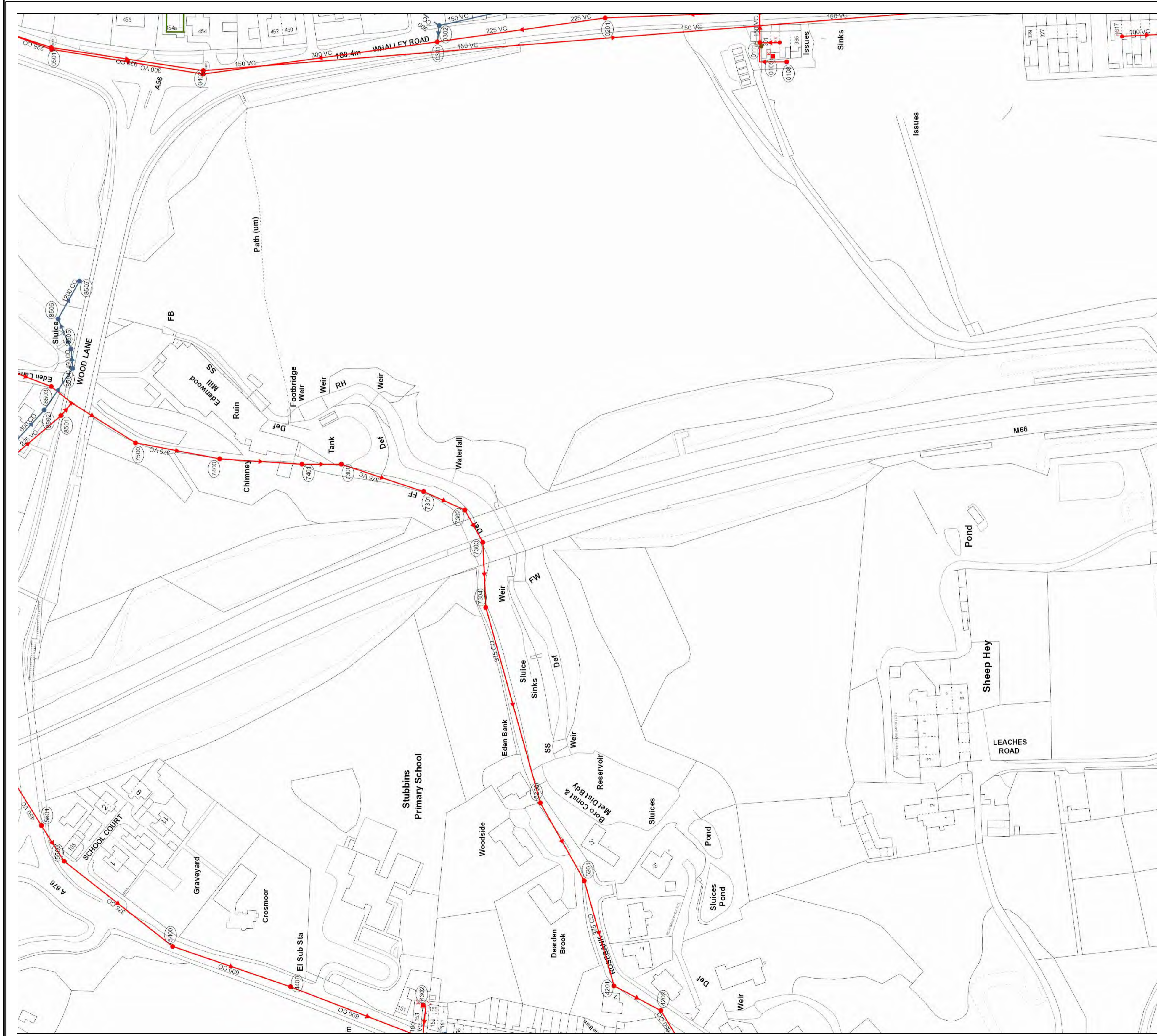
Please do not hesitate to contact me on the details below to discuss further should you require additional information or clarification.

Kind Regards

[Redacted signature]
Graduate Flood Risk Analyst

BETTS HYDRO
Consulting Engineers

[Redacted contact information]



| RefNo | Cover | Func | Invert | Size x | Shape | Stay | Stax | Shape | Mail | Length | Grid |
|-------|--------|------|--------|--------|-------|------|------|-------|------|--------|------|
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| 8544 | 174.38 | SW | 0.00 | 150 | VC | 0 | 150 | VC | CO | 11.21 | 1B 3 |
| 8545 | 174.38 | SW | 0.00 | 150 | VC | 0 | 150 | VC | CO | 11.21 | 1B 3 |

LEGEND

Abandoned

- Surface Water
- Public Sewer
- Private Sewer
- Section 104
- Sluice Main
- Water Course
- Highway Drain

All point assets follow the standard colour convention:

- red - combined
- brown - foul
- blue - surface water
- purple - overflow

MANHOLE FUNCTION

- FO Foul
- SW Surface Water
- CO Combined
- OVI Overflow

SEWER SHAPE

- CI Circular
- TR Triangular
- EG Egg
- AR Arch
- OVI Oval
- BA Barrel
- FT Flat Top
- HO Horse Shoe
- RE Rectangular
- UN Unspecified
- SQ Square

SEWER MATERIAL

- AC Adhesives Cement
- BR Brick
- PE Polyethylene
- RP Reinforced Plastic Matrix
- CC Concrete
- CSB Concrete Segment Bored
- CSU Concrete Segment Unbored
- CC Concrete Box Culverted
- PSC Plastic/Steel Composite
- GRC Glass Reinforced Plastic
- DI Ductile Iron
- PVC Polyvinyl Chloride
- CI Cast Iron
- SI Soap Iron
- ST Steel
- VC Vitified Clay
- PP Polypropylene
- PF Plain Fibre
- MAC Masonry, Coursed
- MAR Masonry, Random
- U Unspecified

Manhole

- Side Entry Manhole
- Outfall
- Screen Chamber
- Inspection Chamber
- Bifurcation Chamber
- Inlet
- Lamp Hole
- T Junction / Saddle
- Catchpit
- Valve Chamber
- Valve
- Vertical Chamber
- Vertical Chamber
- Vertical Chamber
- Network Storage Tank
- Sewer Overflow
- Gully
- Ww Treatment Works
- Flow Meter
- Hatch Box
- Oil Interceptor
- Summit
- Drop Shaft
- Office Plate

Change of Characteristic

Address or Site Reference:
 1 BURNISIDE,
 RAMSBOTTOM,
 BURY,
 BLO 0LW

OS sheet SD7918SE
Number:
Scale: 1:1250
Nodes: 71
Sheet: 3 of 6
Date: 16/03/2020
Printed by: Property Searches



The position of the underground apparatus shown on this plan is approximate only and is given in accordance with the best information currently available. United Utilities Water will not accept liability for any loss or damage caused by the actual position being different from those shown.

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LEGEND

Abandoned

- Surface Water
- Public Sewer
- Private Sewer
- Section 104
- Sludge Main
- Water Course
- Highway Drain

All point assets follow the standard colour convention:

- red - combined
- blue - surface water
- purple - overflow

Manhole

- Side Entry Manhole
- Outfall
- Screen Chamber
- Inspection Chamber
- Bifurcation Chamber
- Lamp Hole
- T. Junction / Saddle
- Catchpit
- Valve Chamber
- Vent Column
- Non Return Valve
- Prestack Chamber
- Network Storage Tank
- Sewer Overflow
- Ww Treatment Works
- Flow Meter
- Septic Tank
- Oil Interceptor
- Summit
- Drop Shaft
- Office Pit

MANHOLE FUNCTION

- FO Foul
- SW Surface Water
- CO Combined
- OV Overflow

SEWER SHAPE

- CI Circular
- EG Egg
- AR Arch
- OV Oval
- BA Barrel
- FT Flat Top
- HO Horse Shoe
- RE Rectangular
- UN Unspecified
- SO Square

SEWER MATERIAL

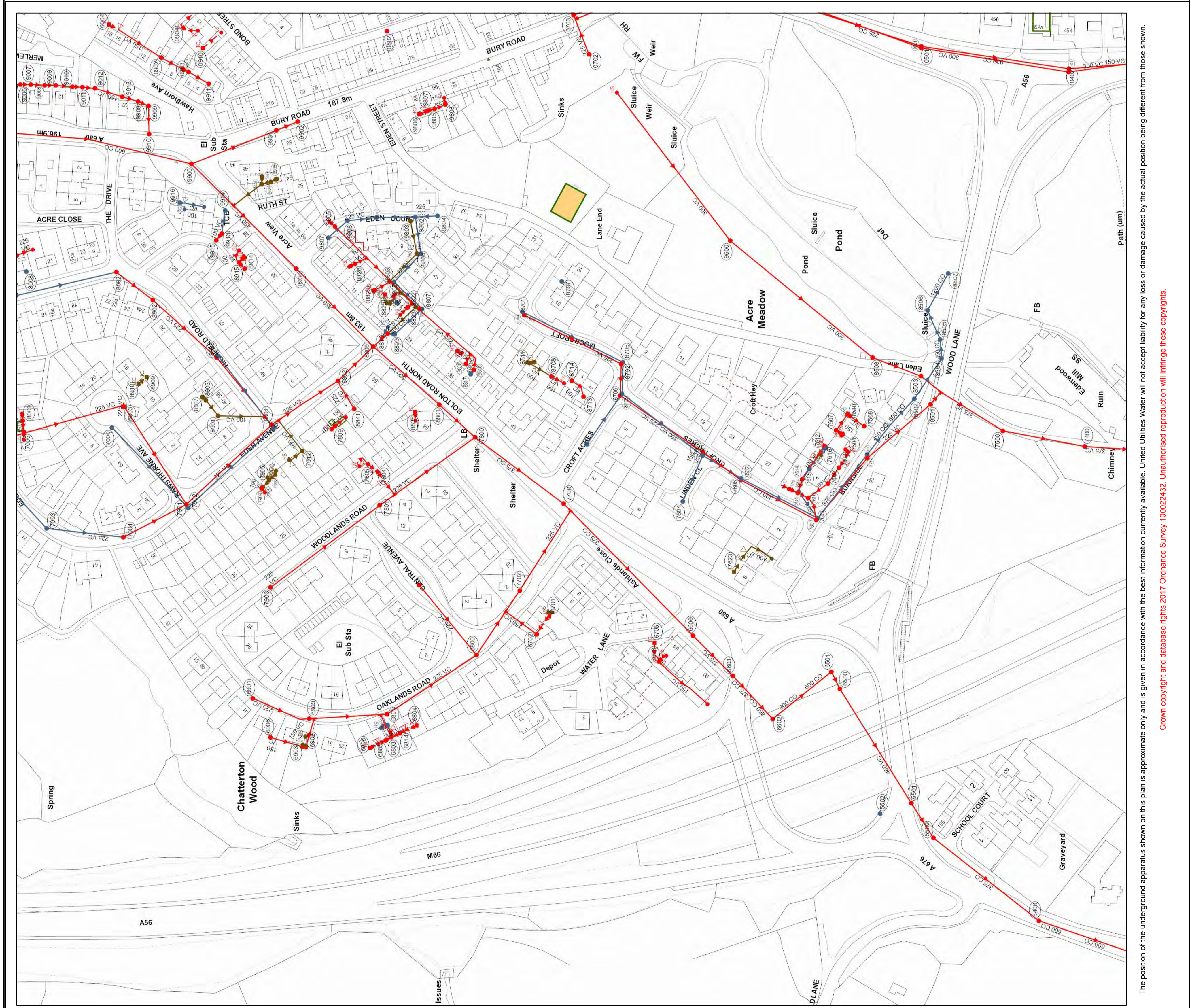
- AC Asbestos Cement
- BR Brick
- PE Polyethylene
- RP Reinforced Plastic Matrix
- CC Concrete
- CSB Concrete Segment Bored
- CSU Concrete Segment Unbored
- CC Concrete Box Culverted
- PSC Plastic / Steel Composite
- GRC Glass Reinforced Plastic
- DI Ductile Iron
- PVC Polyvinyl Chloride
- CI Cast Iron
- SI Spun Iron
- ST Steel
- VC Unfilled Clay
- PP Polypropylene
- PF Pile Fibre
- MAC Masonry, Coursed
- MAR Masonry, Random
- U Unspecified

Address or Site Reference:
 1 BURNSIDE,
 RAMSBOTTOM,
 BURY,
 BLO 0LW

OS sheet SD7918NE
Number: 1:1250
Scale: 1:1250
Nodes: 188
Sheet: 4 of 6
Date: 16/03/2020
Printed by: Property Searches



| RefNo | Cover | Func | Invert | Size x | Shape | Material | Length | Grid |
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| 9100 | FO | FO | 182.2 | 150 | CO | VC | 1.31 | 118 25 |



The position of the underground apparatus shown on this plan is approximate only and is given in accordance with the best information currently available. United Utilities Water will not accept liability for any loss or damage caused by the actual position being different from those shown.

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E APPENDIX E – LANCASHIRE COUNTY COUNCIL AND ROSSENDALE BOURGH COUNCIL CORRESPONDENCE

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[Redacted]

From:

Subject:

Flood Risk Information

Attachments:

LOCATION PLAN.pdf

F.A.O Flood Risk, Drainage and/or Planning department

To whom it may concern

Edenwood Mill, Rossendale

Please could you confirm whether you have any information that you feel would be valuable to a Flood Risk Assessment and Drainage Management Strategy for the site above (see location plan attached), including details of historical sewer flooding; this would be greatly appreciated. If there are any specific requirements that you require in a scope of works for this site please can you advise at this stage so that it can be fully incorporated into the proposals at an early stage.

Please do not hesitate to contact me on the details below to discuss further should you require additional information or clarification.

Kind Regards

[Redacted] GradCIWEM
Graduate Flood Risk Analyst

BETTS HYDRO
Consulting Engineers

[Redacted]
[Redacted]
www.betts-associates.co.uk

CIVIL | STRUCTURAL | GEO-ENVIRONMENTAL | HYDROLOGY | FLOOD RISK MANAGEMENT
SUDS | STRUCTURAL SURVEYS | PARTY WALL DUTIES | INFILTRATION | GEOTECHNICAL

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[Redacted]

From:

Subject:

Flood Risk Information

Attachments:

LOCATION PLAN.pdf

F.A.O Flood Risk, Drainage and/or Planning department

To whom it may concern

Edenwood Mill, Rossendale

Please could you confirm whether you have any information that you feel would be valuable to a Flood Risk Assessment and Drainage Management Strategy for the site above (see location plan attached), including details of historical sewer flooding; this would be greatly appreciated. If there are any specific requirements that you require in a scope of works for this site please can you advise at this stage so that it can be fully incorporated into the proposals at an early stage.

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APPENDIX F – SURFACE WATER CALCULATIONS AND QUICK STORAGE ESTIMATES

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Calculated by:

Site name:

Site location:

Site Details

Latitude:

Longitude:

Reference:

Date:

This is an estimation of the greenfield runoff rates that are used to meet normal best practice criteria in line with Environment Agency guidance "Rainfall runoff management for developments", SC030219 (2013), the SuDS Manual C753 (Ciria, 2015) and the non-statutory standards for SuDS (Defra, 2015). This information on greenfield runoff rates may be the basis for setting consents for the drainage of surface water runoff from sites.

Runoff estimation approach

FEH Statistical

Site characteristics

Total site area (ha):

Methodology

Q_{MED} estimation method:

BFI and SPR method:

HOST class:

BFI / BFIHOST:

Q_{MED} (l/s):

Q_{BAR} / Q_{MED} factor:

Hydrological characteristics

| | Default | Edited |
|--------------------------------|---------|--------|
| SAAR (mm): | 1339 | 1339 |
| Hydrological region: | 10 | 10 |
| Growth curve factor 1 year: | 0.87 | 0.87 |
| Growth curve factor 30 years: | 1.7 | 1.7 |
| Growth curve factor 100 years: | 2.08 | 2.08 |
| Growth curve factor 200 years: | 2.37 | 2.37 |

Notes

(1) Is Q_{BAR} < 2.0 l/s/ha?

When Q_{BAR} is < 2.0 l/s/ha then limiting discharge rates are set at 2.0 l/s/ha.

(2) Are flow rates < 5.0 l/s?

Where flow rates are less than 5.0 l/s consent for discharge is usually set at 5.0 l/s if blockage from vegetation and other materials is possible. Lower consent flow rates may be set where the blockage risk is addressed by using appropriate drainage elements.

(3) Is SPR/SPRHOST ≤ 0.3?

Where groundwater levels are low enough the use of soakaways to avoid discharge offsite would normally be preferred for disposal of surface water runoff.

Greenfield runoff rates

| | Default | Edited |
|-------------------------|---------|--------|
| Q _{BAR} (l/s): | 56.16 | 55.49 |
| 1 in 1 year (l/s): | 48.86 | 48.28 |
| 1 in 30 years (l/s): | 95.47 | 94.34 |
| 1 in 100 year (l/s): | 116.81 | 115.42 |
| 1 in 200 years (l/s): | 133.1 | 131.52 |

This report was produced using the greenfield runoff tool developed by HR Wallingford and available at www.uksuds.com. The use of this tool is subject to the UK SuDS terms and conditions and licence agreement, which can both be found at www.uksuds.com/terms-and-conditions.htm. The outputs from this tool are estimates of greenfield runoff rates. The use of these results is the responsibility of the users of this tool. No liability will be accepted by HR Wallingford, the Environment Agency, CEH, Hydrosolutions or any other organisation for the use of this data in the design or operational characteristics of any drainage scheme.

SURFACE WATER RUN-OFF CALCULATION SHEET



Development EDENWOOD MILL, ROSSENDALE
Project No. HYD510

Revision B **Completed by** MB
Date 03/04/2020 **Checked by** KW

Areas

| | | |
|-----------------------------------|-------|--------|
| Total Site | 3.150 | ha |
| Development Area ¹ | 3.150 | ha |
| Existing Impermeable | 0.315 | ha |
| Existing Impermeable ² | 0.000 | ha |
| Existing Pervious | 2.835 | ha |
| Existing Pervious ² | 0.000 | ha |
| Proposed total impermeable | 1.575 | ha 50% |

Run-off Rates

| Pre-development | | |
|------------------------------------|-------------------|-----------|
| Impermeable ----- | 1yr | 0.0 l/s |
| | 30yr | 0.0 l/s |
| | 100yr | 0.0 l/s |
| 40mm/hr ³ 0.0 l/s | | |
| Pervious ⁴ ----- | 1yr | 48.3 l/s |
| | 30yr | 94.3 l/s |
| | 100yr | 115.4 l/s |
| | QBar ⁵ | 55.5 l/s |
| Total ----- | 1yr | 48.3 l/s |
| | 30yr | 94.3 l/s |
| | 100yr | 115.4 l/s |
| Post-development (without control) | | |
| Impermeable ⁶ ----- | 1yr | 84.1 l/s |
| | 30yr | 152.6 l/s |
| | 100yr+40%CC | 266.7 l/s |

Volumes

| Pre-development | | |
|--------------------------------|-------------|-------------|
| Impermeable ----- | 1yr | 0.0 cu.m |
| | 30yr | 0.0 cu.m |
| | 100yr | 0.0 cu.m |
| Pervious ⁴ ----- | 1yr | 524.3 cu.m |
| | 30yr | 984.2 cu.m |
| | 100yr | 1308.1 cu.m |
| | Total ----- | |
| Total ----- | 1yr | 524.3 cu.m |
| | 30yr | 984.2 cu.m |
| | 100yr | 1308.1 cu.m |
| Post-development | | |
| Impermeable ⁶ ----- | 1yr | 42.2 cu.m |
| | 30yr | 84.1 cu.m |
| | 100yr+40%CC | 105.0 cu.m |

Catchment Characteristics

| | | |
|------------------|-------|-------|
| SAAR | 1323 | mm |
| SPR | 0.52 | |
| BFI | 0.326 | |
| | | |
| i ₁ | 19.2 | mm/hr |
| i ₃₀ | 34.9 | mm/hr |
| i ₁₀₀ | 43.5 | mm/hr |
| d ₁ | 26.8 | mm |
| d ₃₀ | 53.4 | mm |
| d ₁₀₀ | 66.6 | mm |

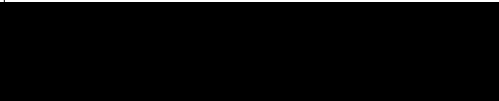
Stormwater Storage Estimates
 Based on Greenfield run-off QBar

Microdrainage Quick Storage Estimates (using FEH catchment data)

| Return Period | Rate | lower | upper | mean |
|---------------|----------|-------|-------|-----------------|
| 1yr | 55.5 l/s | 50 | 144 | 97 cu.m |
| 30yr | 55.5 l/s | 251 | 410 | 330.5 cu.m |
| 100yr+40%CC | 55.5 l/s | 597 | 885 | 741 cu.m |

1/ The 'development area' removes areas of POS and/or landscaped areas of the wider site that are to remain as existing.
 2/ On occasion the existing impermeable area cannot be evidenced to connect and a reduction is applied.
 3/ 50mm/hr is used for BRegs calculations and often used by Water Companies when considering allowable post-development rates of discharge. (Rational Method)
 4/ The Greenfield rates and of run-off have been calculated using the UK SUDS Calculator
 5/ QBar is the estimated flood flow for the 2.33yr return period event and is often used as a post-development rate restriction.
 6/ Post-development run-off is only considered from the impermeable area when the proposed post-development impermeable area >50% in accordance with the EA Guidance Preliminary rainfall runoff management for developments (W5-074/A/TR1/1 rev E (2012)).

NB. The catchment characteristics are from the FEH catchment, the UK SUDS Calculator and Microdrainage.
 NB. The rainfall intensities and depths are calculated for the 6hr duration rainfall event (peak summer intensity)



EDENWOOD MILL
ROSENDALE



Date 30/03/2020

Designed by MB

File

Checked by DK

Micro Drainage

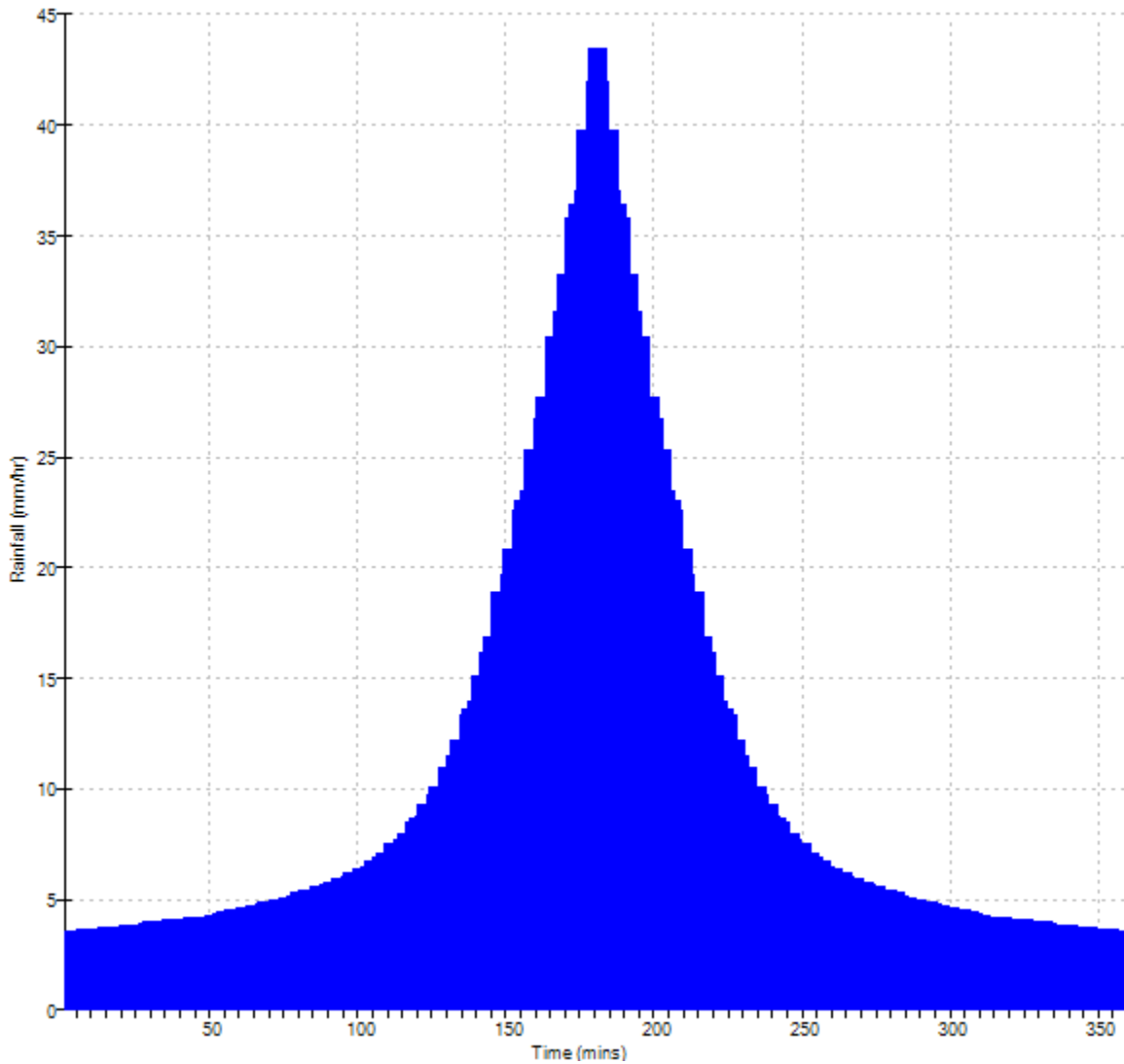
Network 2018.1

Rainfall profile

Storm duration (mins) 360

FEH Data

| | |
|---|--------|
| FEH Rainfall Version | 2013 |
| Site Location GB 379748 418504 SD 79748 18504 | |
| Data Type | Point |
| Peak Intensity (mm/hr) | 43.536 |
| Ave. Intensity (mm/hr) | 11.106 |
| Return Period (years) | 100.0 |



EDENWOOD MILL
ROSSENDALE



Date 30/03/2020

Designed by MB

File

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Micro Drainage

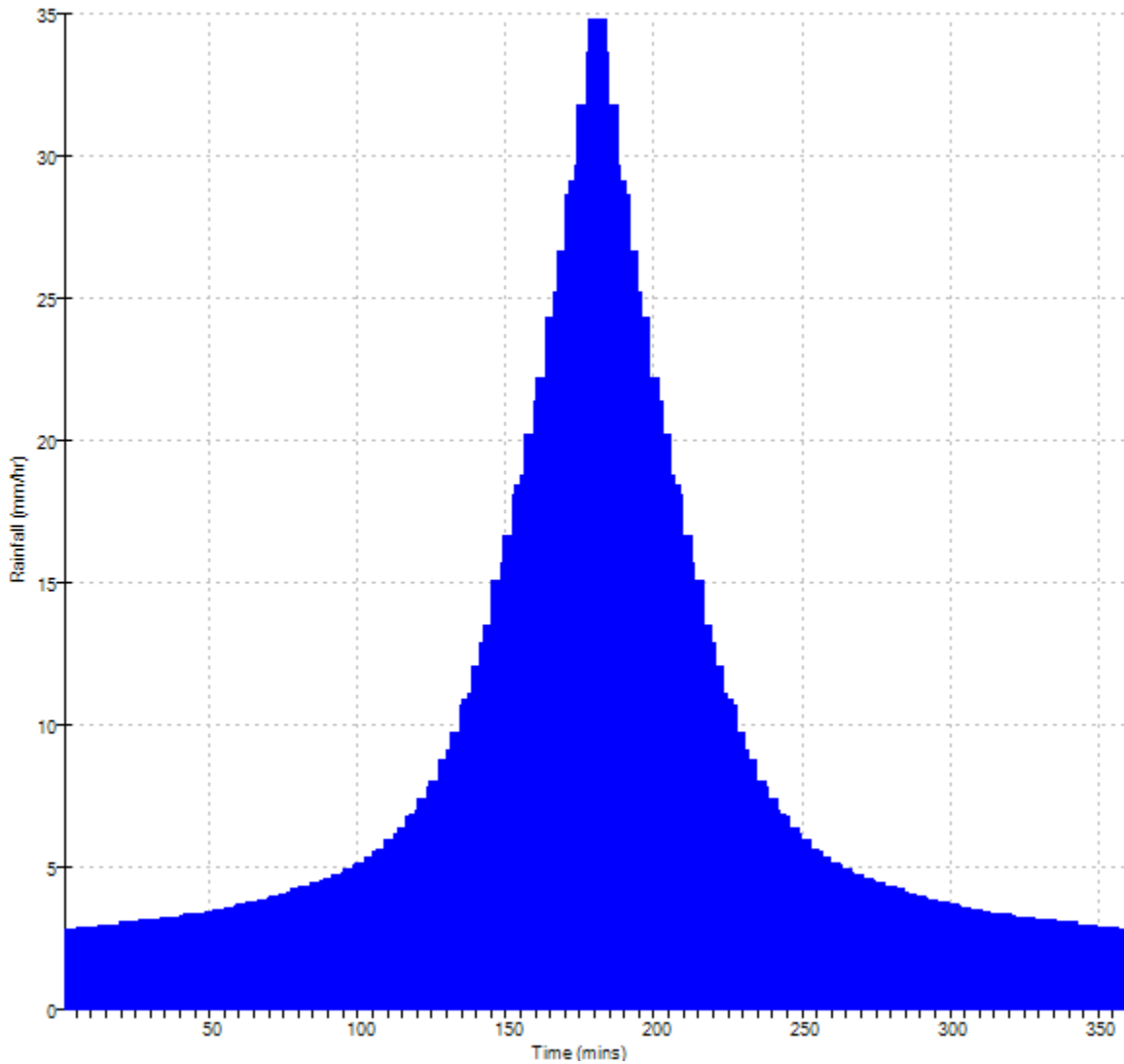
Network 2018.1

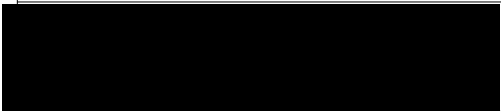
Rainfall profile

Storm duration (mins) 360

FEH Data

| | |
|------------------------|---------------------------------|
| FEH Rainfall Version | 2013 |
| Site Location | GB 379748 418504 SD 79748 18504 |
| Data Type | Point |
| Peak Intensity (mm/hr) | 34.872 |
| Ave. Intensity (mm/hr) | 8.896 |
| Return Period (years) | 30.0 |





EDENWOOD MILL
ROSSENDALE



Date 30/03/2020 13:26

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File

Checked by DK

Micro Drainage

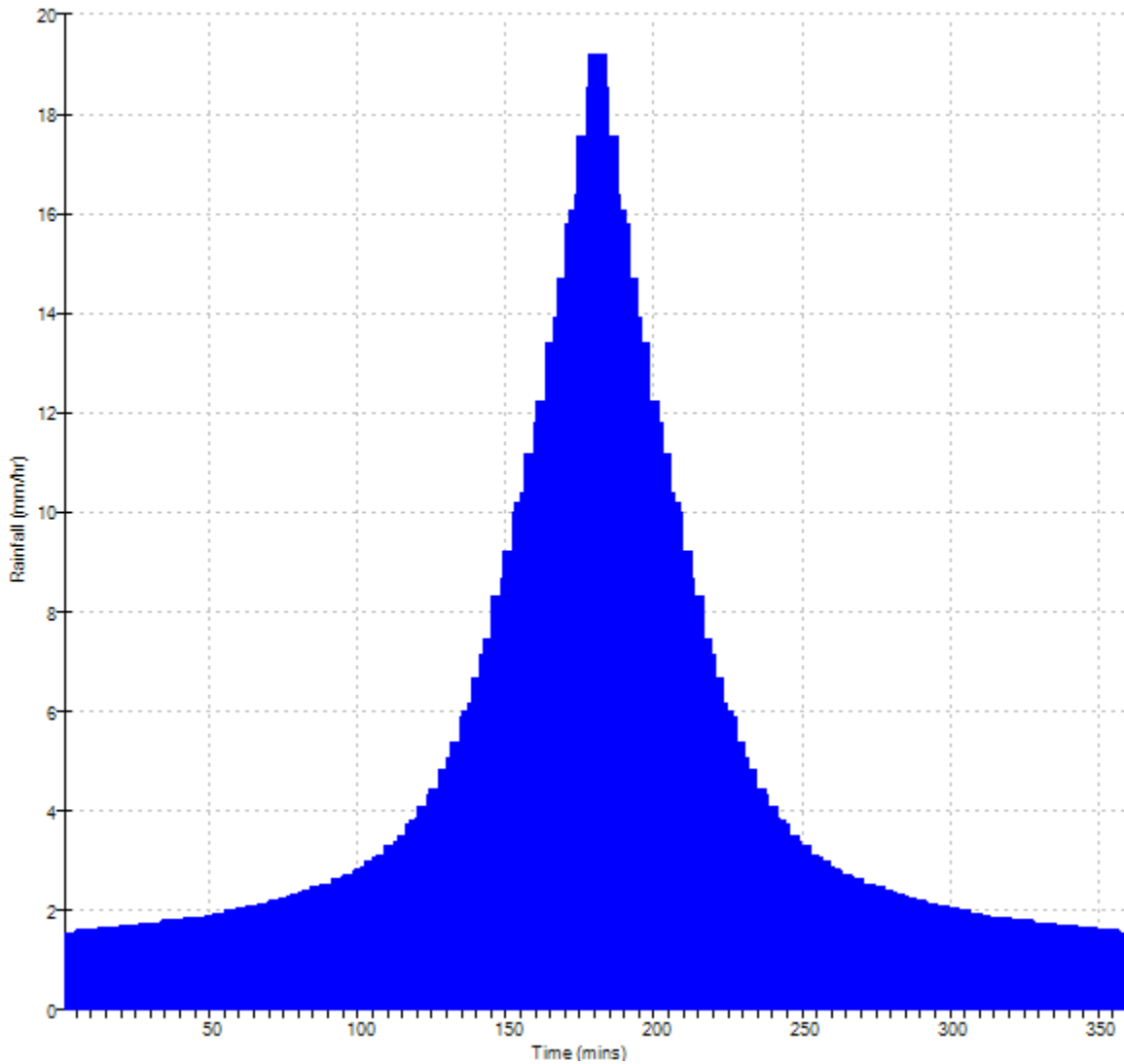
Network 2018.1

Rainfall profile

Storm duration (mins) 360

FEH Data

| | |
|------------------------|---------------------------------|
| FEH Rainfall Version | 2013 |
| Site Location | GB 379748 418504 SD 79748 18504 |
| Data Type | Point |
| Peak Intensity (mm/hr) | 19.226 |
| Ave. Intensity (mm/hr) | 4.905 |
| Return Period (years) | 2.0 |



Date 06/04/2020 10:25
File

Designed by
Checked by



Micro Drainage

Source Control 2018.1

Greenfield Runoff Volume

FSR Data

| | |
|------------------------|-------------------|
| Return Period (years) | 100 |
| Storm Duration (mins) | 360 |
| Region | England and Wales |
| M5-60 (mm) | 19.000 |
| Ratio R | 0.250 |
| Areal Reduction Factor | 1.00 |
| Area (ha) | 3.150 |
| SAAR (mm) | 1329 |
| CWI | 124.088 |
| Urban | 0.000 |
| SPR | 53.000 |

Results

| | |
|--|----------|
| Percentage Runoff (%) | 57.84 |
| Greenfield Runoff Volume (m ³) | 1308.119 |



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File

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Checked by

Micro Drainage

Source Control 2018.1

Greenfield Runoff Volume

FSR Data

| | |
|------------------------|-------------------|
| Return Period (years) | 30 |
| Storm Duration (mins) | 360 |
| Region | England and Wales |
| M5-60 (mm) | 19.000 |
| Ratio R | 0.250 |
| Areal Reduction Factor | 1.00 |
| Area (ha) | 3.150 |
| SAAR (mm) | 1329 |
| CWI | 124.088 |
| Urban | 0.000 |
| SPR | 53.000 |

Results

| | |
|--|---------|
| Percentage Runoff (%) | 55.89 |
| Greenfield Runoff Volume (m ³) | 984.244 |

Date 06/04/2020 10:23
File

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Micro Drainage

Source Control 2018.1

Greenfield Runoff Volume


FSR Data


| | |
|------------------------|-------------------|
| Return Period (years) | 2 |
| Storm Duration (mins) | 360 |
| Region | England and Wales |
| M5-60 (mm) | 19.000 |
| Ratio R | 0.250 |
| Areal Reduction Factor | 1.00 |
| Area (ha) | 3.150 |
| SAAR (mm) | 1329 |
| CWI | 124.088 |
| Urban | 0.000 |
| SPR | 53.000 |

Results


| | |
|--|---------|
| Percentage Runoff (%) | 52.77 |
| Greenfield Runoff Volume (m ³) | 524.348 |


1 YEAR RETURN PERIOD STORM EVENT

| | | |
|---|--------------------------------------|---|
|  Variables Results Design Overview 2D Overview 3D Vt | Variables | |
| | FEH Rainfall | Cv (Summer) 0.750 |
| | Return Period (years) 2 | Cv (Winter) 0.840 |
| | Version 2013 Point | Impemeable Area (ha) 1.575 |
| | Site GB 379748 418504 SD 79748 18504 | Maximum Allowable Discharge (l/s) 55.5 |
| | | Infiltration Coefficient (m/hr) 0.00000 |
| | | Safety Factor 2.0 |
| | Climate Change (%) 0 | |


| | |
|--|---|
|  | Results |
| | <p>Global Variables require approximate storage of between 50 m³ and 144 m³.</p> <p>These values are estimates only and should not be used for design purposes.</p> |


30 YEAR RETURN PERIOD STORM EVENT

| | | |
|---|--------------------------------------|---|
|  Variables Results Design Overview 2D Overview 3D Vt | Variables | |
| | FEH Rainfall | Cv (Summer) 0.750 |
| | Return Period (years) 30 | Cv (Winter) 0.840 |
| | Version 2013 Point | Impemeable Area (ha) 1.575 |
| | Site GB 379748 418504 SD 79748 18504 | Maximum Allowable Discharge (l/s) 55.5 |
| | | Infiltration Coefficient (m/hr) 0.00000 |
| | | Safety Factor 2.0 |
| | Climate Change (%) 0 | |


| | |
|---|--|
|  | Results |
| | <p>Global Variables require approximate storage of between 251 m³ and 410 m³.</p> <p>These values are estimates only and should not be used for design purposes.</p> |


100 YEAR RETURN PERIOD STORM EVENT + 20% CLIMATE CHANGE

| | | |
|---|---|--|
|  Variables Results Design Overview 2D Overview 3D Vt | Variables | |
| | FEH Rainfall | Cv (Summer) <input type="text" value="0.750"/> |
| | Return Period (years) <input type="text" value="100"/> | Cv (Winter) <input type="text" value="0.840"/> |
| | Version <input type="text" value="2013"/> Point <input type="text" value=""/> | Impemeable Area (ha) <input type="text" value="1.575"/> |
| | Site <input type="text" value="GB 379748 418504 SD 79748 18504"/> | Maximum Allowable Discharge (l/s) <input type="text" value="55.5"/> |
| | | Infiltration Coefficient (m/hr) <input type="text" value="0.00000"/> |
| | | Safety Factor <input type="text" value="2.0"/> |
| | Climate Change (%) <input type="text" value="20"/> | |

| | |
|---|--|
|  Variables | Results |
| | <p>Global Variables require approximate storage of between 487 m³ and 720 m³.</p> <p>These values are estimates only and should not be used for design purposes.</p> |

100 YEAR RETURN PERIOD STORM EVENT + 40% CLIMATE CHANGE

| | | |
|---|---|--|
|  Variables Results Design Overview 2D Overview 3D Vt | Variables | |
| | FEH Rainfall | Cv (Summer) <input type="text" value="0.750"/> |
| | Return Period (years) <input type="text" value="100"/> | Cv (Winter) <input type="text" value="0.840"/> |
| | Version <input type="text" value="2013"/> Point <input type="text" value=""/> | Impemeable Area (ha) <input type="text" value="1.575"/> |
| | Site <input type="text" value="GB 379748 418504 SD 79748 18504"/> | Maximum Allowable Discharge (l/s) <input type="text" value="55.5"/> |
| | | Infiltration Coefficient (m/hr) <input type="text" value="0.00000"/> |
| | | Safety Factor <input type="text" value="2.0"/> |
| | Climate Change (%) <input type="text" value="40"/> | |

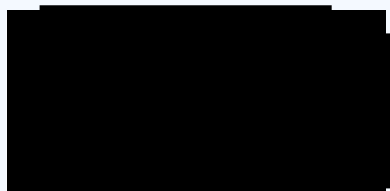
| | |
|--|--|
|  Variables | Results |
| | <p>Global Variables require approximate storage of between 597 m³ and 885 m³.</p> <p>These values are estimates only and should not be used for design purposes.</p> |

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APPENDIX G – DRAINAGE OPPORTUNITIES PLAN

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DATE: 14/04/2020
 REVISION: 1.0
 REF: HYD510





EDENWOOD MILL
EDENFIELD, ROSSENDALE



EXISTING DRAINAGE PLAN





LEGEND

-  Site Extent
-  General Topography

Existing Drainage Features

-  Main River
-  Pond/Slucice

Existing Sewer Network

-  Public surface Water Sewer
-  Public Combined Sewer

FURTHER NOTES:

This drawing is not a drainage 'design' it is a preliminary drainage strategy showing existing sewer locations.

It should be noted the drainage plan only shows key UU sewers within proximity to the site. Please see UU sewer records for full details.



DATE: 14/04/2020
 REVISION: 1.0
 REF: HYD510



EDENWOOD MILL
EDENFIELD, ROSSENDALE

PROPOSED DRAINAGE PLAN



LEGEND

- Site Extent
- Existing Drainage Features**
 - Main River
 - Pond/Sluice
- Existing Sewer Network**
 - Public surface Water Sewer
 - Public Combined Sewer
- Proposed Features & Connection(s)**
 - 8m offset from the Main River
 - Surface Water Connection(s)
 - SuDS/Attenuation
 - Foul Water Connection(s)

FURTHER NOTES:

This drawing is not a drainage 'design' it is a preliminary drainage strategy showing existing sewer locations. It should be noted the drainage plan only shows key UU sewers within proximity to the site. Please see UU sewer records for full details.

No hydraulic simulation or assessment of these proposals has been undertaken. Proposed points of connection to the existing watercourse and sewer require invert levels to be accurately established. Surcharging of the proposed outfall will require modelling to satisfy the requirements of united utilities along with full hydraulic analysis.