

Local Plan – Regulation 24

Consultation on Compensation Measures for Green Belt Release

Responses Received

All Other Responses



Rossendale
BOROUGH COUNCIL

FAO Ann Storah and also in response to the Potential Compensation Measures.

Dear Ann,

Thanks for your time today. As discussed, I am detailing the issues relating to the route of the NCR6.

NR6 design

1. The completed section of the NCR6 runs from Commerce St Haslingden, parallel to the A56 towards Rising Bridge. This is a safe off road route.
2. The end of that section meets the bottom of Carr Hall St where cyclists are expected to ride up to join Hud Hey Road (B6236).
3. The planned and approved route was then intended for cyclists to turn left on to the bypass bridge, cross at a safe dropped kerb mid point to join the next section of the NRC6 along the bridge heading towards the junction with Rising Bridge Road.
4. Once on Rising Bridge Road, cyclists are expected to continue for a short stretch until the NR6 section ends and they have to then ride along the main carriageway which is a very narrow road with cars double parked.

Funding

1. Any request for additional funding from RBC needs to be carefully considered and the concerns and objections of residents seriously affected by the existing partial NRC6, taken into account.
2. There has been clear mismanagement of this whole project, from the initial design through to a complete disregard for a fair and transparent consultation process.
3. We have witnessed road workers laying down double yellow lines along Hud Hey Road and Rising Bridge Road without prior notice which resulted in much upset and stress for many of our neighbours as they lost their parking spaces.

4. We have witnessed those same yellow lines being dug up a few weeks later as another crew began to 'build' the cycle path.

5. We have then witnessed the yellow lines being painted again along the same stretches of carriageway.

6. We have had yellow lines painted through a valuable parking bay despite our objections. I have then witnessed line painters redoing the white lines, only to repaint the white lines of that same parking bay. I attach a photo taken this morning to illustrate the utter incompetence and waste of taxpayers' money.

7. We are having to endure an ever increasing volume of speeding cars, HGVs along Hud Hey Road. I have raised the issue again yesterday with the police as this situation should not be allowed to continue and this road is totally unsuitable to have a cycle route on it.

8. Roy Halliday (LCC) is the Project Manager for this section of the route and he is well aware of the issues. He has had sensible suggestions put to him regarding alternative off road routes including Kings Highway which he rejected due to safety concerns relating to the skip wagons using Clough End Road. Cyclists use Kings Highway on a daily basis. It is a safe and pleasant route for cyclists, walkers and horse riders.

I would ask therefore, where is the logic in having the NCR6 running along Hud Hey Road which has been identified as an area of community concern in terms of speeding vehicles?

9. The Local Plan details proposed development of Land North of Hud Hey. A proposed single access point is at the end of the bypass bridge for HGVs and other vehicles to access the industrial units. This is another consideration which has been overlooked.

How can that access point be safe for pedestrians and cyclists using the NCR6 along Hud Hey Road? There are enough dangerous manoeuvres being undertaken for HGVs accessing the units further down the road.

10. RBC need to listen to residents in this area. There needs to be an investigation into how and why so much taxpayers money has already been wasted. Any additional funding allocated to the completion of the existing stretch of the NCR6 along the bypass bridge on Hud Hey Road would impact adversely upon hundreds of residents in and around Hud Hey and Rising Bridge.

The proof is in the pudding: the cycle path is not being used on Hud Hey Road/ Rising Bridge Road as cyclists prefer to ride at speed along with the other speeding vehicles.

Please do not hesitate to contact me, should you require more information.

Yours sincerely

Christine Holden

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Good morning

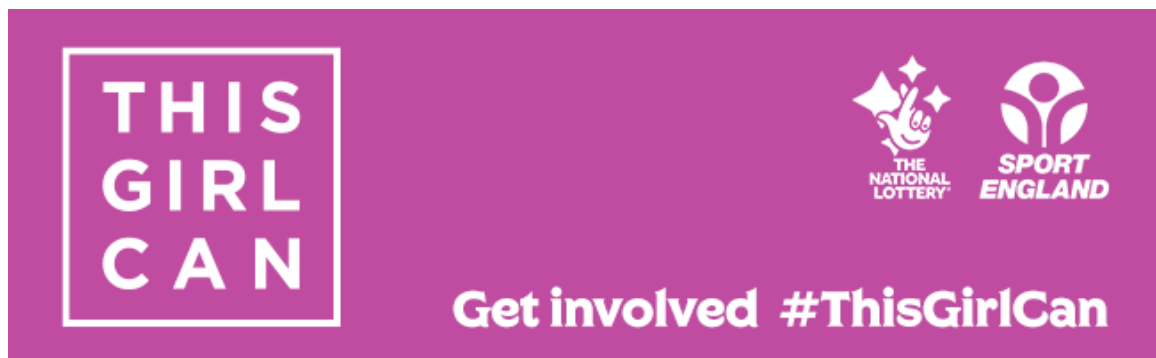
Thank you for consulting Sport England on the above document.

Sport England supports the proposed compensation measures and in particular the improvement of PROW's to create further opportunities for cycling and walking. This is consistent with Sport England's Strategy [Uniting the Movement](#) which encourages physical activity. The proposed compensation measures also help to implement Sport England's objective to create 'Active Environments'.

The proposed compensation measure to improve the cricket pitch at Edenfield Cricket Club is also supported. The action is in line with the findings of the Council's Playing Pitch and Outdoor Sport Strategy (2021). However, as a note for the Council the improvement works will need to be informed by an Agronomy Report undertaken by an England and Wales Cricket Board approved sports turf specialist.

Kind Regards

Fiona Pudge BA(Hons) BTP MRTPI
Planning Manager



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)



Historic England

Direct Dial: [REDACTED]

Our Ref: PL00135762

Forward Planning Team
forwardplanning@rossendalebc.gov.uk

27 July 2021

Dear Sir or Madam,

Consultation on Compensation Measures for Green Belt Release

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.

If you have any queries or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

Emma Feddon
Business Officer
E-mail: [REDACTED]



SUITES 3.3 AND 3.4 CANADA HOUSE 3 CHEPSTOW STREET MANCHESTER M1 5FW

Telephone 0161 242 1416
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.



ROMAN SUMMER

Mrs. A. Storah (Planning)
Rossendale Borough Council
Room 121
The Business Centre
Futures Park
Bacup
OL13 0BB

Our Ref: RG/RG/G267/L001
Date: 26 July 2021

Dear Anne

ROSSENDALE LOCAL PLAN - GREEN BELT COMPENSATORY MEASURES
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 respond to your recent Schedule of Actions - Matter 8 and 15.

That Schedule indicates that development on the H73 site might fund off site Compensatory Measures in respect of improvements along Public Footpath ref: 14-3-1FP125, as below :

H70 Irwell Vale Mill

This application is currently awaiting resolution of the s.106 so it is unlikely that any additional compensatory measures other than those identified already (including the flood mitigation measures) will be requested. Should the current scheme not be progressed further it is expected that the Council will be seeking the flood mitigation measures as agreed with the Environment Agency. However, some cycleway/bridleway improvements have been identified:

- Cycling - Improving the surfacing and drainage on the bridleway (14-3-BW 414) connecting Milne St (in Irwell Vale) westwards to National Cycle Route (NCR) 6.
- Cycling - Improving this bridleway route eastwards along Hardscough Lane towards Church Lane and Blackburn Rd (in Edenfield), and linking to H72.
- PROW – improve footpath 14-3-1FP125 to tramper standards from Lumb viaduct along the River Irwell to Chatterton. (This has been costed at £40K).

H73 Edenwood Mill

PROW - Within 400m of this proposed allocation are the improvements to 14-3-FP125 along the River Irwell, discussed for H70 above.



Our clients have requested that – subject to any viability considerations – they consider that a contribution of up to £40,000 towards such footpath enhancements is likely to be affordable, and such they are, in principle and subject to viability, agreeable to making that commitment.

We trust that you will forward this letter to the Inspector.

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 Richard Gee at the above offices ([REDACTED]).

Yours faithfully
for Roman Summer Associates Ltd



Richard Gee
Director



The Coal
Authority

Rossendale Potential Compensation Measures for Green Belt Release Consultation

Contact Details

Planning and Development Team
The Coal Authority
200 Lichfield Lane
Berry Hill
MANSFIELD
Nottinghamshire
NG18 4RG

Planning Email: [REDACTED]
Planning Enquiries: [REDACTED]

Date

27 July 2021

Dear Forward Planning Team

Rossendale Potential Compensation Measures for Green Belt Release Consultation

Thank you for your notification received on the 15 July 2021 in respect of the above consultation.

I have reviewed the information provided in Examination Library 11 and can confirm that the Planning team at the Coal Authority have no specific comments to make on the compensation measures for Green Belt release.

Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully

[REDACTED]

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader (Planning)



Homes
England

Forward Planning Team
Rossendale Borough Council
Futures Park
Bacup
Rossendale
OL13 0BB

By email: forwardplanning@rossendalebc.gov.uk

28th July 2021

Dear Sir / Madam,

Consultation on Compensation Measures for Green Belt Release

Homes England Response

As a prescribed body, we would firstly like to thank you for the opportunity to comment on the Compensation Measures for Green Belt Release.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.

Yours faithfully,



P.P Nicola Elsworth
Head of Planning and Enabling

Homes England
1st Floor Churchgate House
56 Oxford Street
Manchester
M1 6EU

Please send all Local Plan and related consultations to
nwlocalplanconsultat@homesengland.gov.uk

0300 1234 500
www.gov.uk/homes-england

OFFICIAL

Address included if necessary!

Marie-Louise Charlton B.A.(Hons) M.Ed. A.C.P.
Education Consultant and Writer

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----- Forwarded message -----

From: Marie Charlton ██████████
To: Forward Planning <forwardplanning@rossendalebc.gov.uk>
Cc: planning@rossendalebc.gov.uk <planning@rossendalebc.gov.uk>
Sent: Wednesday, 28 July 2021, 14:40:59 BST
Subject: compensation measures

Forward Planning Team

With reference to planning Application; 2019/0339 Relevant Compensation Measures - including Papers and research.

**A single 400year old oaka whole ecosystem of such creatures for which ten thousand 200 year old oaks are no use at all
Oliver Rackham Woodlands 2006**

With reference to your request for compensatory measures for the stealing of green belt land -

Golden rule: The best solution is no compensation (because no compensation is needed) I.e., in the investment planning, it is primarily needed to avoid environmental impacts that would require compensation. Compensation planning should be treated as the "last step in the protection of the environment" – an exquisite, rather than a standard solution. All other terms of compensation – including the one formulated below - must be interpreted in the light of this fundamental rule. Compensation cannot be used for „making investments easier”, for authorizing investment without „appropriate assessment”, for authorizing investment in case of no overriding public interest, nor for selecting an alternative destruction for Natura 2000 sites.

[Compensation guidance \(ceeweb.org\)](http://ceeweb.org)

Please read this valid and valuable paper.

Of importance is the fact that a suitable building area adjacent to the particular one in question has now been released meaning that building could take place without the disastrous effects of destroying this invaluable piece of green belt land

Rossendale's compensation measures for green belt release do not have sufficient depth or detail and shows no understanding of the negative ecological and environmental impact that stealing green land will have particularly at this disastrous time in our climate emergency. Every inch of green land lost means further damage to the atmosphere as CO2 absorbing capability is removed. A complete rethink of RBC planning policy is required and should be fought for in all quarters especially as there is no need to use green belt land as researched and stated below.

EL11.001b - Compensation Measures for Green Belt Release

Compensation measures need to be knowledgeable regarding the flora and fauna of individual areas and a critical and expert and **objective** assessment made about the value of these and the possibility of compensation being possible reviewed. As we now know facile and superficial compensatory measures are NOT working and are further killing off the planet, A disturbance in ecosystems impacts not only the animals concerned but the whole community as reactions are far reaching. What is more in this case of proposed development, net gain stated as a priority for RBC is unable to be achieved because of the specialised nature of the CO2 absorbing peat underlay of this marshy land and its consequential flora and fauna

At last a comprehensive report ..find in Consultations on EL 10.001 Housing Update May 2021 ...Representations by A H Ashworth and R W Lester THERE IS NO NEED TO BUILD ON GREEN LAND This should close the whole debate down and offer more hope and optimism for the future of our borough and the world in general.

The importance of protecting green land cannot be overemphasised as Paul Miner argues below on behalf of CPRE to which many of Rossendale's councillors have signed up.

01.02.15

The importance of protecting green belt land

Source: *Public Sector Executive Feb/Mar 2015*

Paul Miner, planning campaign manager at the Campaign to Protect Rural England (CPRE), discusses the benefits of protecting green belt land, and how using brownfield sites can help tackle the country's housing crisis

The green belt is good, positive planning. It stops urban sprawl and encourages the vital regeneration of our largest cities. It provides the countryside next door to 30 million people and protects the setting of many of our historic settlements. And, though not the principal purpose, it protects the attractive landscapes so important to our environment, heritage and wellbeing.

Without the green belt, we would have the urban sprawl that we see across Europe and North America. Both UN-Habitat and the European Commission have highlighted the particular problems arising from uncontrolled urban sprawl around large cities. Sprawl has all kinds of negative impacts, including loss of farmland and wildlife, increased car use, and neglect of older towns and cities. CPRE and Natural England analysis conducted in 2010 shows that the rate of development in green belts is between 33% and 50% lower than comparable areas of land on the edge of English cities without green belt designation.

There is a housing crisis and a desperate need to build more well-designed, well-located and affordable homes. But some organisations believe that building on the green belt is a solution to the housing crisis – partly because of its proximity to cities, and partly due to its 'low environmental value'. All we need to do, they argue, is to relax designations.

Green belt policy is already very flexible. Figures published in August 2014 by construction analysts Glenigan indicate that 5,600 new homes were approved in the green belt in 2013, a worrying 148% increase since 2009. Furthermore, local authorities across England are arguing that 'exceptional circumstances', as set out in planning policy, exist to justify building up to 200,000 new houses on current green belt land.

It has also been argued that we could build one million new houses within one mile of railway stations around London alone, on green belt land of supposedly low environmental value. But this severely underestimates the wide range of benefits that the green belt offers, and would lead to the urban sprawl that the green belt was precisely designed to prevent. It would also make countryside harder to access by public transport from within London.

Green belt land often includes significant local biodiversity and heritage assets, but it also captures carbon, provides space for water to prevent flooding, and protects the water supply. The Natural Capital Committee in January 2015 called for the creation of 250,000 hectares of woodland and 100,000 hectares of wetland close to urban areas. The best way to achieve this is to maintain existing green belt policy, rather than weaken it. To illustrate, the Colne Valley Regional Park was created by following up planning conditions to restore old gravel pits, rather than condemning them as scruffy land or seeing them developed as a sprawling extension of west London.

Furthermore, most of the green belt – about two-thirds – is in agricultural use. This cannot be considered of low environmental value when global population growth and climate change are putting increasing pressure on land, and when we grow less than two-thirds of our own food. Now, more than ever, we need to avoid unnecessarily losing our countryside.

The solution we should be, and increasingly are, pursuing is the redevelopment of brownfield sites – 'previously developed' land. Derelict sites within cities and close to their economic and social opportunities should not be ignored in favour of cheaper or more convenient sites for developers.

Crucially, there is plenty of brownfield land available for development. In November 2014, a CPRE report found that there were enough sites to accommodate at least one million new homes – even after setting aside those brownfield sites that were of recreational or wildlife value, or could be developed for other purposes such as employment. In addition, more than 400,000 homes already have planning permission on such sites.

Significantly, the research also found that brownfield land is far from drying up: more brownfield land became available between 2010 and 2012 than was developed.

In our efforts to tackle the housing crisis, suitable brownfield land and not green belt should be the priority. We can also provide more affordable housing in villages for local people, and improve public transport links to encourage economic growth where housing is relatively cheap and plentiful, as Milton Keynes, Peterborough and Swindon already show.

There really is no need for either major releases of green belt land or wholesale changes to policy, when we have such a plentiful range of other options available.

What is more **Taylor Wimpey** the proposed developers although known for their generosity to councils and government are not known for their ethics with regards to our planet and oppose plans to cut carbon emissions, admittedly for profit purposes. Exactly the type of developers we do not need where cutting corners and disrespect for our earth and all on it supports its destruction

[Housebuilder Taylor Wimpey opposed plans to cut new home emissions | Construction industry | The Guardian](#)

As I began the best compensation for stealing green belt land is not to steal it. It is not necessary in this case and at this absolutely critical time in the planet's evolution To do so would be in my opinion an act of criminal disregard for the planet and all who exist on it and would make the future of our children increasingly precarious.

Yours faithfully

Marie-Louise Charlton

[REDACTED]
[REDACTED]
[REDACTED]

Marie-Louise Charlton B.A.(Hons) M.Ed. A.C.P.
Education Consultant and Writer

[REDACTED]

Examination of the Rossendale Local Plan

EL11.001b - Compensation Measures for Green Belt Release

Representations by A.G. Ashworth and R.W. Lester regarding RBC's Paper published July 2021

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Page 1 Key Points

Page 2 Representations

Key Points

- **Ambiguous closing date prejudices actual and potential representers and vitiates the consultation.**
- **Consultation period was too short.**
- **RBC fail to set out strategies requested by the Inspectors and policies required by Planning Guidance, leaving a host of unresolved issues.**
- **Many projects suggested in RBC's document are located outside remaining Green Belt, or even wrongly asserted to be in the Green Belt, and as such do not meet national planning policy criteria for compensatory improvements and must be discounted.**
- **Of the suggested schemes that could meet those criteria, the Inspectors' questions "how/where/when/what?" are largely unanswered.**
- **Some schemes involve matters which are needed to make the development acceptable in planning terms and which therefore cannot be double-counted as compensating for the release of Green Belt.**
- **There is a particular lack of clarity in the New Hall Hey Gateway proposals, compounded by the lack of a clear plan.**
- **RBC have misled the public by suggesting schemes outside the Green Belt.**
- **The consultation was irredeemably flawed. A new document and fresh consultation are required**

Examination of the Rossendale Local Plan

EL11.001b - Compensation Measures for Green Belt Release

Representations by A.G. Ashworth and R.W. Lester regarding RBC's Paper dated January 2021

Representations

1. Consultation closing date

1.1 According to RBC's website Local Plan Examination page the consultation 'will continue until 5pm on Wednesday 28 July'. According to document EL11.001a on the website the consultation 'ends on Thursday 29 July 2021 at 5pm'.

1.2 The ambiguity in the closing date is unacceptable and vitiates the consultation. It is particularly prejudicial to those who, for whatever reason, learn of the consultation through the website page late in the period (whatever it is) and take the view that they cannot meet the 28th July deadline but would have responded had they believed the close to be on 29th July. It prejudices also those who rush to respond by 28th July, when they might have welcomed another day.

1.3 RBC might say that all responses received by the later date will be considered, but that is not the point.

1.4 The consultation period is in any case too short. If RBC was serious about asking for thoughts about other schemes that might be included (EL11.001a), they would have asked much sooner and certainly not at the onset of the summer holidays and would have allowed more time for responses.

1.5 In passing we note that, as well as the muddle over the closing date, the consultation document ('the document') is poorly presented with spelling, grammatical and typing errors too numerous to mention and a List of Contents on page 1 that does not match the actual contents.

2. Policy background

2.1 The starting-point in considering RBC's consultation document {'the document'} should be National Planning Policy. We therefore reproduce the relevant paragraph of NPPF and paragraphs 002 and 004 of Policy Guidance.

2.2 NPPF, former paragraph 138 (renumbered 142 in the July 2021 revision), provides:

*When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. **They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.** [Our emphasis.]*

2.3 It is surprising that the document does not quote paragraph 142, which makes clear that the emerging plan should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

2.4 Guidance published by MHCLG on 22nd July 2019 contained advice on the rôle of the Green Belt in the planning system. It includes the following:

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

Where it has been demonstrated that it is [necessary to release Green Belt land for development](#), strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. [Our emphasis.]

These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

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

Paragraph: 002 Reference ID: 64-002-20190722

Revision date: 22 07 2019

2.5 Guidance published by MHCLG on 21st July 2019 explains key issues in implementing policy to protect and enhance the natural environment, including local requirements. It asked:

What can green infrastructure include?

Green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies.

References to green infrastructure in this guidance also apply to different types of blue infrastructure where appropriate.

Paragraph: 004 Reference ID: 8-004-20190721

Revision date: 21 07 2019

2.6 RBC's consultation document reproduces most of the Guidance set out above except, crucially, the need for policies.

2.7 In view of its disregard of NPPF, paragraph 138, and its selective reproduction of Planning Guidance, it is regrettable but not surprising that the document does not propose any policies.

3. Identified schemes within Rossendale

3.1 Section 3 of the document begins:

The Council has identified projects which could contribute to Green Belt compensation. Some of these measures are Borough-wide whereas others relate specifically to identified allocation(s).

3.2 What RBC should be identifying are not 'projects which could contribute to Green Belt compensation' but ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. It is clear from EL11.001a that RBC know that this is what the Inspectors, and 'national planning guidance', require. It is therefore bizarre that a significant part of the document lists projects that are, or are likely to be, outside the Green Belt.

3.3 The document lists a number of schemes. We consider whether each scheme meets Planning Guidance criteria for compensatory improvements

3.3.1 Rossendale Forest

3.3.1.1 There are four paragraphs in the document under this heading, but only the first deals with the actual Rossendale Forest project. Clearly, woodland planting could be a compensatory improvement. The issue is its location. As no new sites are identified, there is no certainty that any will be in the Green Belt. The Inspectors' questions 'where/when?' are not answered, and there is a shortage of detail about 'how/what'.

3.3.1.2 Enhancing existing woodland by management and improving biodiversity could be compensatory improvements, although it could well be argued that management is a duty of ownership and not something that developers should be required to subsidise.

3.3.1.3 New or enhanced walking or cycling access routes could be compensatory improvements, subject to location.

3.3.1.4 Only one site is mentioned - Horncliffe Woods, which is in the Green Belt - but it is not clear whether the biodiversity improvement scheme applies to all or part of the Woods. No timescale is provided. The document should have included a plan. If the measures to improve biodiversity have been identified, as the document stated, the document should have set out the details. The document fails to answer in sufficient detail the Inspectors' questions 'how/when/where/what'.

3.3.1.5 The document says LCC lease land from RBC but is vague about location. A plan should have been provided. We note that LCC disposed of some land at Horncliffe Woods in September 2020 - see <https://www.pugh-auctions.com/property/11712> - but the document does not indicate what contact has taken place between RBC and the new owners.

3.3.1.6 The closing sentence of the section on Rossendale Forest concludes:
All schemes involving the loss of Green Belt may contribute to this

but what 'this' refers to is not clear.

3.3.2 Rossendale Incredible Edible

3.3.2.1 There seems to be no justification for including this as a possible compensatory improvement. It looks extremely improbable that Incredible Edible would organise any projects in the remaining Green Belt. Its focus would appear to be on communities growing their own food at home or in shared community spaces. It is not suggested that they have a track record of projects in Green Belt either in Rossendale or elsewhere in England. It should be discounted as a possibility.

3.3.3 New Hall Hey Gateway

3.3.3.1 The first paragraph in the document under this sub-heading is unclear. Enhancing facilities in land outside the Green Belt is obviously irrelevant to the issue. Improving access to the remaining Green Belt could be a compensatory improvement but there is insufficient detail. The Inspectors' 'how/when/what?' is unanswered. It would have helped representers if RBC had explained that paragraph with a plan showing Green Belt remaining after proposed site allocations and proposed enhanced access thereto,

3.3.3.2 The second paragraph is entirely irrelevant and must be discounted. The document needs to consider compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Any improvements to land outside the Green Belt and to the north-east of allocation NE4 are irrelevant in this context. The reference to paths along the River Irwell is unclear, but it is assumed it means paths to the north-east of allocation NE4. It is doubtful whether improvements to those paths improve accessibility to remaining Green Belt.

3.3.4 Edenfield Recreation Ground and Play Area

3.3.4.1 Whatever is proposed for the Recreation Ground and Play Area is irrelevant as under the Plan proposals they will not be in Green Belt.

3.3.4.2 The mooted provision of allotments on development sites is irrelevant for the same reason.

3.3.5 Edenfield Community Centre

3.3.5.1 The Centre is not in Green Belt. Improving it would therefore not be a compensatory improvement in the remaining Green Belt and as such is irrelevant.

3.3.6 Edenfield Cricket Club

3.3.6.1 Whilst it is located in Green Belt, it is hard to see how levelling the outfield would improve the environmental quality of the remaining Green Belt or compensate for the loss of Green Belt.

3.3.7 Edenfield C.E./ Stubbins Primary School Extension.

3.3.7.1 if either school were to be extended into the Green Belt, the provision of Green Infrastructure or playing pitch improvements or travel to school routes would be part and parcel of the measures necessary to make the extension acceptable. This part of the document attempts to double-count such measures as compensation for the housing allocations in the Green Belt. Accordingly those measures must be discounted for the purposes of the document

3.3.8 Pages 6 and 7

3.3.8.1 RBC incorrectly state that Sand Beds Lane is in the Green Belt.

3.3.8.2 In the absence of a Plan it is unclear whether the proposals for 'NE4 Extension of New Hall Hey' would be located in Green Belt or improve its accessibility. Some or all of the proposals might be necessary to make any development at NE4 acceptable and in that case could not be double-counted as compensating for the loss of Green Belt.

3.3.8.3 The other suggested projects are located in Green Belt and to some extent would improve its accessibility. The Inspectors' question 'when?' remains unanswered.

3.3.8.4 What remains unclear is the extent to which the suggested PROW/Cycleway improvements can be classed as compensating for the loss of Green Belt. They could well be, or could need to be, carried out, irrespective of the proposed Green Belt releases.

3.3.9 Consultees have been misled

3.3.9.1 We are deeply concerned that by including in the document schemes outside the Green Belt RBC have misrepresented to the public that such schemes could constitute compensatory improvements for the purposes of NPPF, paragraph 142 (formerly 138). Indeed, it is likely to have encouraged responders to suggest other schemes located outside the Green Belt.

4. Conclusion

4.1 In response to the Inspectors' request for a list of potential sites/schemes which could provide compensation for Green Belt loss, (i.e., how/where/when/what?) RBC purport to identify a number of schemes. After those that are irrelevant for the purposes of NPPF, paragraph 142 and those that lack particularity as to 'where/when' have been stripped out, all that are left are vague references to improving biodiversity in Horncliffe Woods and dealing with diseased trees there and some PROW/Cycleway improvements. Even for these the question of 'when' is not addressed, and there is a lack of clarity about 'how/what?'.

4.2 The glaring omission from the document is any strategy, notwithstanding:

- the Inspectors' express request;
- the requirement in NPPF, paragraph 142 for plans to 'set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land'; and
- the requirement in Guidance for 'strategic policy-making authorities [to] set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land'.

4.3 In the absence of any proposed policy it is unclear -

- whether a contribution from every scheme involving the loss of Green Belt would actually be required and secured;
- how RBC would deal with a situation where a developer argued that a Green Belt payment, with or without other planning obligation demands, was not viable;
- whether RBC would guarantee compensatory improvements if the developer is unable or unwilling to finance them; and

- how the impact of the loss of Green Belt and the extent of the compensatory improvements will be assessed.

4.4 We note, in passing, that Keppie Massie's Local Plan Economic Viability Assessment Update Report (EL8.020.2) at Appendix 8 listed some schemes for H72 under the heading 'GREEN BELT COMPENSATORY MEASURES', but they were described so briefly that it was not clear where the schemes would be located. Their total cost was comparatively low at £107,494, qualified by a note that they were 'provisional allowances that are assessed without the benefit of a defined scope or in many cases any quantification'. This underlines the need for a policy to determine the value of required compensatory improvements in the remaining Green Belt.

4.5 It is not just a question of the inadequate content of the document. Because of the misrepresentation and consequent confusion (as noted at paragraph 3.3.9 above) the consultation is irredeemably flawed. The only remedy is for a fresh document to be prepared and consulted upon.

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum

28th July 2021

Dear Sirs,

We trust that you will pass these comments on to the Inspectors dealing with the Rossendale District Plan.

Rossendale Civic Trust does not want to give the impression that its members or those in the wider community with whom we have discussed this matter at length, have been, or are, in any way 'Nimby' or selfish in making the comments that have already put in on the proposals to build on the Green Belt in Rossendale.

Our comments should be taken not as objections, but as genuine reasons why the Green Belt as designated in the past should remain Green Belt. It may have the superficial, and undeniably important benefits of visual and recreational value, but its designation lies on the basis that it is unsuitable in many ways for development due to underlying geographical and topographical conditions.

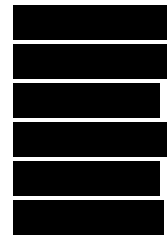
To impinge upon these conditions would be totally impractical. To disturb the natural composition and function of the land as it exists at this point in time, i.e. its contribution to carbon retention, flood prevention and both fauna and flora would cause damage that could never be compensated for.

Imposition of infrastructure, including access, would impinge on the condition and quality of life of those already living on the edges of Green Belt land, whose environment has been tailored to the landscape as envisaged by historical natural understanding of the land and subsequent Planning decisions which did not take into consideration that there would be any further expansion.

Consequently, we must point out that there can be no compensation for building in the Green Belt, only loss, of our past evolution, our present precarious balance, and any possible future enjoyment, either in leisure or practical terms, of what our remaining Green Belt has to offer.

Yours faithfully,

Kathleen A. Fishwick (Chair, Rossendale Civic Trust)



**EL11.001b Compensation Measures for Green Belt Release
Housing Development H74**

I write in relation to the above document, produced by Rossendale Borough Council, which outlines its strategy for potential sites/schemes which could provide compensation for green belt loss. Although the proposed housing development site H74 is not included in the documentation, I wish to bring to the attention of the Inspectors a change to the Urban Boundary which would facilitate this proposal.

In its email notification on the subject of Consultation on Compensation Measures for Green Belt Release, Forward Planning states, "this is an opportunity to suggest potential compensation measures if green belt land is to be released, not to object to the release itself, and such comments will not be considered." As an organisation who has worked on behalf of members of the local community for 30 years, we have expressed comments and objections to Planning Application 2019/0335 through the correct channel i.e. the Planning Application Website.

The above document does not include site H74, presumably because it fails to meet the green belt classification; however it is nevertheless in danger of being covered by 139 houses. It is interesting to note that the Council has identified schemes within Rossendale where compensatory measures can be implemented, in particular the following:

Rossendale Forest

"The Council's Climate Change Strategy and Action Plan 2020-2030 identifies an action to increase tree cover across the Borough. This is being developed under the name of the Rossendale Forest and work is ongoing through the Council's Corporate Asset Review to identify suitable Council-owned sites. The Council is working with a third party facilitator, the Ribble Rivers Trust, and the Climate Change Network. As well as Council-owned land, other land owners are involved and there would be an opportunity for landowners/developers of land currently in the Green Belt to contribute to this. **The key objectives are to assist with offsetting carbon emissions, as well as assisting with flood prevention and alleviation.**

“Woodland management of existing large areas will also be required. Lancashire County Council lease land from Rossendale Borough Council and measures have been identified to improve the biodiversity at Horncliffe Woods. In particular disease is affecting trees such as ash and larch which will require targeted measures.

“Access to such woodland areas should also be introduced or enhanced to provide additional recreational opportunities.”

To allow site H74 to be covered in houses will fly in the face of Rossendale Borough Council’s long standing Environmental Strategy for Rossendale “How Green is Our Valley” (see attached document).

This land is aptly suited to be included in ‘Rossendale Forest’ as it currently fulfils a very important role in combating climate change, outlined in a paper by Tony Hodbod MSc (copy attached).

Rossendale Borough Council is in danger of allowing an area of old mossland, covered by deep peaty topsoil containing the remains of ancient vegetation preserved in the acidic environment, a rich habitat for many wildlife species, to be churned up by construction activity when this ancient material will oxidise and give off greenhouse gasses.

There is potential to provide an area for tree planting within the site to enhance the established woodland and ancient hedgerows, which under current plans will see their destruction.

It should be noted that over many years Mr Hodbod, a member of GRAss, and volunteers have planted over 18,000 trees at Mary’s Wood on the Grane hillside overlooking the site, an important contribution to ‘Rossendale Forest.’ He intends to hand over the woodland to a public body to be preserved as a permanent landscape feature.

Why would a Council, eager to use Compensation Measures for Green Belt Release on a credible scheme such as ‘Rossendale Forest,’ consider destroying an area of open countryside in Grane, fulfilling the role of a carbon sink, for profit under the guise of economic growth? The most effective way to compensate is not to build on site H74 as it is currently combating climate change on many levels.

Michael Murray MBE
Chairman

28 July 2021

Rossendale Borough Council
Environmental Strategy For Rossendale
or
How Green is Our Valley

Extracts from the above 15 page document written by Phillip Mepham, Interim Manager, Environmental Health – 13 February 2007

The local environment impacts not only on the health of the people of today's and tomorrow's Rossendale but also contributes to the environment experienced by the wider world.

The actions and decisions made by many agencies, organisations and individuals have an impact on the environment and will continue to have an impact for many years to come. The environment is important to Rossendale because of the effect on feelings of wellbeing in addition to health and the economy.

The Council and its partners, recognise the importance of this issue and have expressed a Vision for the future which includes the state of the future environment. This strategy identifies a number of aspects of the environment where action today will safeguard and improve the environment both today and tomorrow. The aspects have been identified as a framework of Aims and are as follows:

Aim 1 – Climate Change and Energy – to limit climate change by controlling greenhouse gas emissions.

Aim 5 – Air and Noise Pollution – to minimise air and noise pollution in Rossendale.

Aim 8 – Countryside, green spaces and biodiversity – to protect, conserve and enhance Rossendale's countryside, green spaces and biodiversity.

Each of these Aims will be achieved through the co-ordinated action by agencies, organisations and individuals. Actions will be included in relation Action Plans.

The local environment impacts not only on the health of the people of today's and tomorrow's Rossendale but also contributes to the environment experienced by the wider world. This brings to life the phrase 'Act locally, think globally.'

Regionally, the Lancashire Partnership's strategic vision is described in 'Ambition Lancashire 2005-2025' with its aim of achieving a greener Lancashire. Their Vision for 2025 is where Lancashire is a County where the dramatic beauty of our landscape and wildlife is cherished, and our urban areas contain fine buildings and inviting open spaces. Lancashire plays its part in addressing global environmental issues and delivering environmental sustainability. This Environmental Strategy represents Rossendale's contribution to achieving the Lancashire Vision.

The choices made today, and the behaviour resulting from those choices, impact on the environment and the environment impacts on everyone. By focussing on measures and choices we can enable the Government's aims to be delivered locally. By acting with

National, Regional and Local agencies, businesses, voluntary and community organisations, communities and families, we can achieve the overall Vision described above.

The Council will lead by example, demonstrating good practice and how it can be replicated. The Council is a substantial employer and property owner, and works with a wide range of businesses and organisations. **It will seize every opportunity it can to influence and encourage others to take part in its plans to safeguard and improve the environment.**

Eighty eight percent of the borough is green space and a quarter of this is designated green belt land. It is an area of high landscape and recreational value. The Borough offers excellent opportunities for active leisure.

Rossendale's built environment is characterised by the remains of its industrial heritage – there are over 260 listed buildings and eight conservation areas. Stone-built terraced housing constructed before 1919 forms a third of the housing in the borough.

Many people live in Rossendale because of its environment. Public surveys repeatedly highlight the natural environment as the most important factor in the quality of life in the borough. **The Council, conscious of the value of this most vulnerable asset, aims to maintain and enhance it for local people.**

The Borough has numerous environmental attributes, including several Sites of Special Scientific Interest. The Council's local plan states that the Council wishes to perpetuate the distinctive character of Rossendale's society and culture, to conserve the attractive physical environment, to improve those features that need enhancement and to remedy, in conjunction with other agencies, the unattractive aspects of dereliction, obsolescence, pollution, contamination and conflicting land use.

The Council and the Rossendale Partnership have agreed a Vision for the Borough's future which is stated as 'Rossendale Alive.' It sets out a long-term strategy to improve the quality of life in Rossendale which is contained in eight strategic objectives, one of which relates to the environment.

Climate change is one of the most serious environmental problems facing the world. Climate change is almost certainly caused by a build up of manmade emissions of greenhouse gasses in the atmosphere, including carbon dioxide and methane. These gasses are released through the combustion of fossil fuels for energy generation and transport purposes, but also during the landfill disposal of biodegradable waste and from the use/disposal of products containing greenhouse gasses.

The Intergovernmental Panel on Climate Change (February 2007) reported that evidence and understanding of the warming and cooling influences on the climate leads them to consider, with a 90% certainty, that the increases in global warming are due to human activities. Research shows that the effects of climate change on the UK are likely to include:

- Higher temperatures all year
- More extreme weather events including hurricanes, flash floods and droughts

- More coastal and river flooding
- Frequent disruption to transport and other infrastructure

- Loss of native wildlife

We depend heavily on the use of energy in our every day lives for the heating and power supply to our homes and workplaces, for transport and for commercial and industrial uses. The majority of our energy is generated from non-renewable resources such as coal, oil and gas, the supplies of which are not without limits. The burning of these fuels releases pollutants such as sulphur dioxide, nitrogen oxides and small particles into the atmosphere affecting local air quality. Perhaps a more serious problem is the release of carbon dioxide, a contributor to climate change. It is therefore essential that we conserve precious resources by using energy wisely and look instead to the use of renewable technologies including biomass, wind, small-scale hydro-generation, wave and solar energy and other green technologies.

Objectives for the future – (includes) To understand, and where possible, mitigate the effects of climate change.

The Council has a key role in ensuring a cleaner and greener environment and performance in this respect has a significant impact on the public's perception of the Council in general.

Our quality of life depends on transport for easy access to work, school, shopping, leisure and community facilities. However, the way we travel and the continued increase in road traffic is degrading local air quality, causing congestion and contributing to climate change and the depletion of non-renewable resources.

Looking at when we travel and why we travel is important, as is using public policy to ensure that new developments are located appropriately and make it easier to use sustainable means of transport.

Objectives for the future – To minimise the environmental impact of traffic, including air pollution and noise. To reduce the levels of congestion in the valley.

Air pollution is detrimental to human health, can damage buildings and building materials and has significant effects on wildlife, soils and water. While the air quality in Rossendale is generally good, pollution levels are increasing in some areas due to increased traffic levels. Emissions from commercial premises and bonfires also contribute to pollution levels. Motor vehicles emit a range of pollutants including nitrogen dioxide, hydrocarbons, carbon monoxide and small particles, which are particularly hazardous to health. In addition the combustion of fuels for transport, heating and power purposes produces carbon dioxide, which is linked to climate change.

Objectives for the future – to maintain and improve air quality in the valley and to minimise the effects of noise on quality of life.

The latest forecasts suggest that summers will be drier, while winters will be wetter with increasing occurrences on flash floods, heightened by increased surface run-off caused by extension of the built environment.

To ensure the long-term future of the water environment it is therefore important that we use water wisely and safeguard it from pollution. We also need to protect communities

against future flooding incidents by regular maintenance of flood defence schemes, the avoidance of building on flood plains and the incorporation of sustainable urban drainage systems into new developments to control surface water runoff.

Objectives for the future – To effectively manage flood risks in the valley.

Land is a finite resource. The pressures on the use of land for homes, job, shopping, leisure, food production, transport and building materials can lead to the loss of what is most valued in the environment. We therefore need to balance the protection of our environment whilst allowing sustainable forms of development that will bring about economic growth, employment and social progress. **This includes concentrating development on previously developed or ‘brownfield’ land, where possible, in order to protect the green spaces.**

Soil is important for a number of reasons:

- Soil stores and partly transforms minerals, organic matter, chemicals and energy. It also acts as a natural filter for groundwater
- Soil is the habitat for a huge number of organisms

Objectives for the future – To protect Rossendale’s surrounding moorland, parks and green spaces. To make full and effective use of land and buildings within the urban area through bringing the under-used derelict sites and structures back into use where practicable.

Overall aim – to protect, conserve and enhance Rossendale’s countryside, green spaces and biodiversity.

Rossendale’s natural green spaces and associated wildlife make a major contribution to the quality of life for those who live and work in Rossendale. They also contribute towards Rossendale’s image as a green borough and serve to make it an attractive place for companies and people to locate to.

The green environmental infrastructure is important for several reasons:

- Trees ensure that we can breathe by taking CO₂ out of our air
- Protects and enhances wildlife and natural habitats, which is important for its own sake

At any one time we are faced by a variety of global and local environmental issues, such as climate change, loss of biodiversity, acid rain, litter, air pollution, increased waste production and traffic congestion. These problems are, however, generally the result of the accumulation of local impacts. **It is therefore important that local action is taken to protect the environment in order to maintain and improve the quality of life of both present and future generations.**

The scientific evidence that climate change is a serious and urgent issue is now compelling. It warrants strong action to reduce greenhouse-gas around the world to reduce the risk of very damaging and potentially irreversible impacts on ecosystems, societies and economies. With good

policies the costs of action need not be prohibitive and would be much smaller than the damage averted (Stern Report, 2006).

The power that individuals have to influence change, through the actions and decisions taken every day, can have a large impact on the environment.

Changes in land-use would have a range of influences on the environment and these would need to be understood:

- Make environmental issues 'cool' and become the norm
- Target specific groups with specific messages which are tailored to them
- Recognise the economic impact of environmental actions or inactions
- Understand the feasibility of proposed initiatives e.g. carbon sinks, for Rossendale

The Council's Environmental Health service will lead on monitoring and reporting progress to the Council and LSP. In addition, it will collect evidence, endeavour to gain commitment and look for any synergistic effects between people's or organisations' activities. During the first 6 months, work will concentrate on establishing the identity of interested organisations and individuals, their knowledge and capabilities, setting baselines and indicators and identifying existing and potential actions. These will be brought together in an Action plan during the winter of 2007/8 and the cycle of consultation, encouragement, commitment and delivery repeated annually thereafter.

26 July 2021

The land between Grane Road and Holcombe Road in Haslingden, proposed for development as a housing estate by Taylor Wimpey, should be left undisturbed for several very good reasons. It is a piece of open land and is a valuable green space on the edge of the town. It supports a lot of wildlife. It holds a huge amount of water from both underground inflow and rainfall. It is an important flood mitigation resource and reduces flood risk from the River Ogden.

It is also an important local carbon sink. The land is old mossland covered by deep peaty topsoil containing the remains of ancient vegetation preserved in the acidic environment. If the land is churned up by construction activity this ancient material will oxidise and give off greenhouse gasses.

It has been reported (The Guardian 5 July) that the builder Taylor Wimpey has opposed government plans to reduce carbon emissions from new homes by at least three-quarters and argued against heat pumps, a replacement for gas boilers, which are one of the UK's biggest causes of greenhouse gasses. So, if this plan is approved, instead of having an efficient carbon sink on our doorstep we would have some 130 plus gas boilers venting carbon dioxide and carbon monoxide into the atmosphere.

In the Borough Council's 2007 Environmental Strategy for Rossendale paper 'How Green is our Valley' the first stated aim is to limit climate change by controlling greenhouse gas emissions. To grant permission for the building of a housing estate on a carbon sink would be a policy U-turn too far.

The land should remain undisturbed or be made into a park.

Tony Hodbod MSc

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

29th July 2021

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

Sent by email

Dear Anne,

**Compensation Measures for Green Belt Release EL11.001B (Action 8.10 update)
Taylor Wimpey Comments (in relation to Edenfield Allocation H72)**

We are writing with comments on the Council's 'Compensation Measures for Green Belt Release' (Ref: EL11.001B) document on behalf of Taylor Wimpey in respect of their land interests within Allocation H72. This document comprises an update to action 8.10 and was issued on 14th July 2021 for comment from developers over a two week period closing on 29th July.

This document summarises the PPG guidance (para 64-002-20190722) on the types of compensatory improvements that plans might include, repeated in full below for clarity:

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

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

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

It then sets the compensation measures proposed across Rossendale, including boroughwide schemes that all Green Belt development sites can contribute to (parts a and b) then more specific measures related to individual allocations (parts c, d and e).

Those measures relevant to Edenfield are summarised below:

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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- (a) Rossendale Forest – *contributions to woodland management.*
- (b) Rossendale Incredible Edible – *contributions to growing food in open spaces.*
- (d) Compensatory Measures Specifically for Edenfield Housing Allocations:
 - (i) Edenfield Recreation Ground and Play Area – *improve facilities and planting.*
 - (ii) Edenfield Community Centre – *improve facilities.*
 - (iii) Edenfield Cricket Club – *improve clubhouse and level pitch.*
 - (iv) Edenfield C.E. / Stubbins Primary School Extension – *improve playing pitches and travel to school routes.*
 - (v) Public Rights of Way / Cycleway Upgrades and Improvements to the Network for Specific Housing Allocations – *various connectivity improvements to PROWs and cycle paths.*

At the outset, we welcome the acknowledgement in part d(iv) that provision for a new school is no longer required within the site, and that improvements will instead be sought to the extension of either Edenfield or Stubbins Primary school. This reflects paragraph 30 of the EIP Inspectors' Post Hearing Letter dated 30th June, which states:

"The Local Education Authority has indicated that the expansion of either Edenfield or Stubbins primary school will be required to facilitate growth. Criteria t in Policy HS3 should be amended accordingly, including removal of reference to a new school. The designated area to the rear of Edenfield school, as shown on the Policies Map, should be re-termed 'potential school and playing field extension' to reflect the existence of two options."

General Comments on Proposed Improvements

As noted throughout our previous representations we support the principle of Green Belt compensation in line with the NPPF and PPG, and agree that all the measures and schemes set out align with those listed in the PPG.

We also welcome the fact that the proposed improvements (parts c to e) are largely focused on Green Belt land adjacent to or in close proximity to the housing and employment sites proposed for release, including Allocation H72 in Edenfield, as advocated in our previous representations. Whilst this is not specifically prioritised in national guidance, it helps demonstrate that these improvements and associated financial contributions are directly related to the development to satisfy the CIL tests as part of any future application.

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

That said, we are also in broad support of the two borough wide compensation schemes (Rossendale Forest & Incredible Edible) which align with the Council's wider climate change and health objectives and have the opportunity to provide compensation at a more strategic level (with associated economies of scale) to complement the more localised, site specific measures. Indeed, the overall mix of measures seems appropriate with the majority being site specific, with some overarching schemes.

Overall however, we still have concerns with the proposed measures and the level of supporting evidence presented for them at this stage, particularly in respect of viability and land ownership.

Viability

As stressed throughout our representations, the viability implications of any proposed compensation measures need to be properly defined and accounted for before they can be adopted in the plan, otherwise it could undermine delivery of these much needed allocations. This is particularly important in Rossendale given the well-known viability issues across the borough.

In this instance, we refer to the Council's latest Viability Assessment (Update Report) prepared by Keppie Massie and dated February 2021, and specifically the tables in Appendix 8 (shown below). Whilst this table includes some costings for the Edenfield specific measures listed in the document, there is no provision for the two boroughwide projects (Rossendale Forest and Incredible Edible), or improvements to the two schools, Community Centre or public rights of way/cycleways.

H72	LAND WEST OF MARKET STREET, EDENFIELD - 400 UNITS	
	Allowance for signage	£2,500
Sport and recreation	Enhancements to cricket and recreation ground links	£20,000
	Contribution to enhance facilities	£25,000
	Allowance for additional tree planting	£20,000
Landscape	Allowance for mitigation measures	£30,000
		£97,500
	Fees 5%	£4,875
	Contingencies 5%	£5,119
		£107,494

This suggests that the viability implications of Green Belt compensation on allocation H72 have been significantly underestimated, and when read alongside our previous representations (Ref: R006v3 – March 2021 – section 10) on the Viability Update, which confirms that abnormal costs on H72 have also been underestimated, this could generate a significant viability issue with the wider scheme. As such, until more detailed costings are provided for all the compensation measures proposed, we are unable to commit to them, as they will simply not be able to satisfy the CIL tests.

Land Ownership

Several of the measures set out, most notably the travel to school routes for the two nearby primary schools and the other PROW/ cycleway upgrades, will more than likely involve third party land, outside the Council or developers' control.

If such land is involved, the Council will need to ensure the relevant permission or access rights are secured from the landowner, as well as the legal basis for any contribution payments. Any off-site mitigation required by the developers on land that is not within their control can only ever be a contribution to the Council as to ensure the sites remain deliverable and the Local Plan remains sound.

Conclusions

Taylor Wimpey support the principle of compensatory improvements to Green Belt, and broadly support the suite of measures set out, which align with national guidance, and focus on land directly adjacent to site's proposed for release (including allocation H72 at Edenfield), mixed with some boroughwide schemes.

We have provided initial comments on the different measures outlined, however it is clear that the viability implications have not been properly accounted for, even with the February 2021 Viability Assessment Update, and have been underestimated as a result.

The Council will also need to provide further evidence in respect of land ownership and securing the relevant access rights and permissions to deliver some of the measures, as the developers can only commit to contributions towards any off-site mitigation proposals.

Without this information we are unable to commit to the improvements and contributions set out, as they will simply not be able to satisfy the CIL tests, and we reserve the right to make further comments as the evidence and detailed proposals evolve.

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

Yours sincerely,

A solid black rectangular redaction box covering the signature of Graham Lamb.

Graham Lamb
Director

Two solid black rectangular redaction boxes covering contact information, likely an email address and a phone number.



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester

Acres Brook, Sabden Road
Higham, Lancashire, BB12 9BL

Telephone: [REDACTED]
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Patron
Her Majesty the Queen
President
Emma Bridgewater
Chair
Debra McConnell

FAO: Forward Planning Team
Rossendale Borough Council,
The Business Centre,
Futures Park,
Bacup,
OL13 0BB

By email: forwardplanning@rossendalebc.gov.uk

19 March 2021

Dear Forward Planning Team,

I am responding on behalf of the Campaign to Protect Rural England (CPRE) Lancashire, Liverpool City Region and Greater Manchester to the Rossendale Local Plan consultation on the Potential Compensation Measures for Green Belt Release.

CPRE, the Countryside Charity

CPRE wants a thriving, beautiful countryside for everyone. We're working for a countryside that's rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency.

With a local CPRE group in every county, we're advocating nationwide for the kind of countryside we all aspire to: 'one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before'.

We stand for a countryside that enriches all our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate. For more information, please visit www.cprelancashire.org.uk.

Previously, we commented on the Local Plan Examination and evidence bases. CPRE wants to see local plan enable true sustainable development principles to achieve well designed rural places, with adequate infrastructure to ensure a good quality of life for all in the future.

Importance of Green Space

CPRE champions the importance of our green spaces.

The Natural Capital Committee report, July 2020 shows despite the Government's 25-Year Environment Plan there is widespread degradation across all type of natural assets and much more needs to be done to protect it. Soils, among other assets, came out with a red-warning and it is an asset that cannot be replaced once lost. Rare and fragile habitats must be protected by the local plan policy.

Covid has further highlighted the importance of our local green space more than ever for our health and well-being. We want Green Space, including protected Green Belt to be protected and enhanced for

future generations. The local plan really should consider how to make our Green Belt assets more accessible.

We are amid an undeniable climate crisis, which is without doubt the most pressing issue our environment faces today. New development must therefore reduce our demand for carbon, such as car dependency by focusing development on previously used land in urban places, relying on rail and bus services, incorporating good networks for walking and cycling based on a '20-minute neighbourhood model'.

CPRE thinks that it is important to focus new development on previously developed land that now vacant or underused, in existing urban settlements that are well served by rail and bus, with a range of community facilities in advance of rural places.

CPRE is opposed to Green Belt development, as it is simply unsustainable. We think the allocations H69, H70, H71, H72, H73, NE1, NE2 and NE4 should be reconsidered for retention as Green Space.

Green Belt

CPRE is proud of its countryside successes, including Green Belt planning policy, which was introduced due to the public concern over the harm being caused by unrestricted urban sprawl, merging of distinct towns, countryside encroachment, protecting heritage setting and supporting urban regeneration came about due to our work.

Rosendale's Green Belt plays these important functions and keeps land permanently open in a spatial and visual way for everyone's benefit and we would welcome any opportunity to add to the amount of designated Green Belt.

Green Belt must not be easily allowed for development, even in the context of the NPPF, which in our experience has led to an acceleration of Green Belt development (five times more than previously) despite Government promises to protect it.

Compensation

We acknowledge that, despite promises to protect the Green Belt, the Government's National Planning Policy Framework (revised in July 2021) Housing Delivery Test renders aims to effectively reuse previously developed land difficult to achieve.

We also note that Planning Practice Guidance on Green Belt states that compensatory improvements may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies.

CPRE agrees with the identified schemes within Rosendale:

- (a) Rosendale Forest
- (b) Rosendale Incredible Edible
- (c) New Hall Hey Gateway
- (d) Compensatory Measures Specifically for Edenfield Housing Allocations:
 - (i) Edenfield Recreation Ground and Play Area
 - (ii) Edenfield Community Centre
 - (iii) Edenfield Cricket Club

(iv) Edenfield C.E. / Stubbins Primary School Extension

(v) Public Rights of Way / Cycleway Upgrades and Improvements to the Network for Specific Housing Allocations

- H70
- H71 and H72
- H72

(e) Other PROW / Cycleway Improvements Linking to Specific Employment Allocations

- NE1
- NE2
- NE3
- NE4

In addition, CPRE recommends additional Green Infrastructure be brought forward including hedgerow as our recent campaign identifies that nationally since 1945, we have lost half of our hedgerows. This is of concern due to the amount of biodiversity that hedgerows support. CPRE is calling on Government to commit to extending the hedgerow network by 40% and we hope local authorities can also support this important action. <https://www.cpre.org.uk/what-we-care-about/nature-and-landscapes/hedgerows/our-hedgerow-campaign/>

Summary

CPRE wishes the team every success in achieving an adopted local plan that will support sustainable neighbourhoods offering protection and enhancement of rural places, and urban greenspace.

We need a high quality of life for people and wildlife of Rossendale in the future. Enhancing rural places and urban greenspace is for everyone's benefit, and new development should be planned in a considered way to achieve this. Where possible please do defend the Green Belt.

Yours sincerely



Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Manager



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Good afternoon

The residents of Acre Village have asked that I represent them and their views in relation to the proposed compensation measures for the green belt release of your reference 15.7 NE2 Land at the north of Hud Hey, Haslingden.

They inform me that their concerns need to be raised by close of business tonight.

Hall Park Residents say:

The land parcel NE2 appears to have been misrepresented as being part of Hud Hey,

Haslingden, even though the stables situated on the land NE2 have a postal address Carterplace stables, Acre, Rossendale.

Remaining Acre Residents say:

A. The land that Rossendale Borough Council are misleadingly calling NE2 – Land north of Hud Hey, Haslingden is part of the historic Carterplace estate which is wholly situated in the village of Acre, Rossendale. This land is correctly addressed as land at Carterplace Stables, Carterplace, ACRE, Rossendale, Lancashire, BB4 5BF.

B. This land is not currently, and never has been situated in the town of Haslingden.

C. Green belt separation serves to preserve the setting and special character of historic settlements such as Acre village and prevent such settlements merging with nearby towns and villages. Your site NE2 forms Acre village's green belt separation from the town of Haslingden along the A680 Blackburn Road, the B6236 Hud Hey Road and Rising Bridge Road.

D. This land is part of a route through our village that [at the appropriate times for deer sightings] villagers frequently see deer travelling along or grazing.

E. This land has been in constant use for agricultural and horse breeding/livery purposes.

Villagers are requesting that:

1. The address/location of the whole of the site NE2 site needs to be correctly addressed and recognised as being in Acre village and that it is Acre village's green belt separation from the town of Haslingden. The correct address is:

Land at Carterplace and Carterplace Stables,

Carterplace

ACRE

Rossendale

Lancashire

BB4 5BF

2. All of Acre's villagers are provided with clear documentation which sets out the exceptional circumstances that exist to justify changes to Acre village's Green Belt boundaries, including the removal and development of their village's green belt separation.

3. The strategic policy-making authority clearly demonstrates to Acre villagers that it has examined fully all other reasonable options for meeting its identified need for development in the village of Acre, Rossendale.

4. The strategic policy-making authority clearly explain to Acre villagers why they are changing the names and locations of sites for development which are situated in Acre village including Acre's green belt [such as your site NE2] in a manner which serves to potentially mislead people.

5. The strategic policy-making authority clearly sets out and provides Acre's villagers the ways in which the impact of removing land from Acre village's green belt separation can be offset through compensatory improvements to Acre's greenbelt [separation.to](#) ensure that urban sprawl is prevented, and Acre village continues to read as a settlement in its own right.

6. The strategic policy-making authority clearly set out and provide to Acre's villagers the ways in which the impact of removing land from Acre village's green belt will be offset through compensatory improvements to Acre's environmental quality, in a way that will positively contribute to conserving and enhancing the natural environment and protect the village's greenbelt.

7. If the authority is to proceed with their plans to remove this land from Acre Village's greenbelt separation with the town of Haslingden then they must ensure that an element of land separation is implemented, in order to counteract the harmful situation of urban sprawl along the A680 Blackburn Road, Rising Bridge Road and Hud Hey Road as well as the eastern side of the A65 and that this land separation must be clearly visible from Blackburn Road,

Hud Hey Road, Rising Bridge Road, the A56 and the many vantage points within the local area so as to clearly differentiate between town and village.

8. That when considering any planning application, local planning authorities must ensure that substantial weight is given to any harm to Acre Villages green belt. They believe that special circumstances will not exist unless the potential harm to the green belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Villagers request that if any land is released from Acre village's greenbelt and greenbelt separation with the neighbouring town of Haslingden and village of Rising Bridge that suitable mitigation to the village of Acre is always provided. Villagers suggest that the following forms of mitigation be considered:

i. That some clearly readable green belt separation **MUST** remain to ensure that the character, setting and heritage significance of Acre is not eroded. Acre must continue to read as a settlement in its own right, and not become urban sprawl along the A680, the A56 or any other road.

ii. Whilst a scenic cycle path in Acre could be an asset, I would not consider the current proposal to be anywhere near suitable mitigation for the harm that is proposed to Acre village's green belt separation. I am also aware that the wider LCC cycle path project is something that is happening anyway! I would request that any cycle path that is created through Acre must be recognised as being in Acre not Haslingden or Rising Bridge. I would also suggest that any cycle path could include a new PROW that can link with the existing National Lottery Heritage Fund funded Acre Village walking trails. This could be added to the Acre Village walking trail map and leaflet (by the Hall Park Residents Association in collaboration with Acre's local historian) and funding provided to print these leaflets for distribution to villagers and the wider public.

iii. Given the amount of horse owners and riders, in the village of Acre and the fact that Acre village's Carterplace Stables which will suffer as a result of the loss of this important green belt separation. I request that in addition to a PROW, the cycle path also incorporates a bridleway to import the provision of safe, off road horse riding trails in the village of Acre.

iv. Carterplace is of immense historic significance both within the village of Acre and the wider community. As a result of the two grade 2 listed buildings (Carterplace Farm and Carterplace Cottage with the adjoining Chantry Cottage), and it's one grade two star listed building (The remains of Carter Place

Hall) which is seen as having National Significance. I request that a heritage style A1 upright Carterplace interpretation panel that mirrors the one in Worsley Park and includes the use of the same Acre village branded template, colour palette and official Acre Village logo [as funded by the National Lottery Heritage Fund] is created and situated somewhere on the land/new cycle path/PROW/Bridleway at Carterplace, Acre, Rossendale, BB4 5BF. To ensure historical accuracy whilst this must be funded as part of mitigation, the interpretation panel must be created by the Hall Park Residents Association, members of Acre village's wider community and the local Acre village historian.

v. It is documented that there are several grassland habitat network wildlife corridors in Acre, including those crossing the north and south of the Winfield's Acre site. This important green belt separation and some of these corridors have been damaged by that landowner as part of their un-permitted development in the green belt which RBC failed to prevent or enforce. Now Rossendale Borough Council are effectively rewarding these acts by removing this land from the green belt! I believe that these actions could set a dangerous precedent that could have a devastating impact on the heritage significant village of Acre, [and other areas in Rossendale]. As such and in line with National Policy/best practice, I request that as part of any mitigation Acre village's wildlife corridors and steppingstone habitats are improved, including the creation of a new one at Carterplace.

vi. Deer, trees and Acre village - in an earlier local plan there were a number of priorities for Acre village, and it was identified at that time that more trees in Acre was the top priority! As there looks to be a move to planting new trees/woodland in Rossendale (and nationally) there's a request that more trees are planted at Carterplace as part of mitigation. This could be on part of the green belt separation from Haslingden and see the resurgence/improvement of the historic Chadwick Wood at Carterplace. This would also contribute to mitigating any the damage to wildlife/deer that are seen grazing and traveling through Carterplace and other parts of the village of Acre.

Manythanks

County Councillor Samara Barnes
Rossendale West

Phone number: [REDACTED]
Email: Samara.Barnes@lancashire.gov.uk

Hello

I would like to point out a number of compensatory measures which may be used to offset the release of green belt land.

Where feasible I believe that these measures would contribute to an improvement/compensation where greenbelt land is to be lost to development.

- Maintain and enhance existing woodlands
- Extensive Tree planting
- Tree planting to connect areas of existing tree cover to create wildlife corridors as we have a lot of fragmented areas of woodland in Rossendale
- Creation of recreational areas for play and sport
- Improve walking and cycling routes

Regards

John McGuinness

"We do not inherit the Earth from our ancestors, we borrow it from our children"