

Local Plan – Regulation 24
Main Modifications Consultation
Responses Received
Part 1 of 5 - Responses 1 - 87



Table of Contents

1. National Highways	1	36. Limey Valley Residents' Association	175
2. Historic England	8	37. David Foxcroft.....	178
3. Michael Watson (Renaker)	13	38. Andy Ashworth	179
4. Carlo Latronico.....	19	39. Phil Hackett.....	187
5. Jason & Sarah Menzies	20	40. United Utilities	195
6. Ian Francis	22	41. Lisa Hunt.....	196
7. Deborah Brown & Andrew Morris	24	42. Sport England	204
8. Elizabeth & John Finn	25	43. David Schofield	205
9. Lancashire County Council Public Health Team	28	44. Rossendale Civic Trust	213
10. Tracey McMahon	29	45. Wesley Mort	214
11. Historic England	31	46. Craig Scott	215
12. Homes England	32	47. Sally Dewhurst	223
13. Katrina & Steven Meager	41	48. Mark Booth.....	229
14. J & H Walton	39	49. Christine Smithies	237
15. Nicholas Cousins	49	50. Josh Sutton & Fiona Shaw	244
16. Deena Burns	51	51. Anne McKown	252
17. Sarah & Andrew Hardman	60	52. Home Builders Federation.....	253
18. The Coal Authority	66	53. Carol Clement	256
19. Julie Baugh	65	54. Nancy Kelly	264
20. Jack Woodworth	75	55. Mason Woods	272
21. Richard Holt	84	56. Philip & Gillian Amatt.....	280
22. Sophie Schofield	92	57. Dorothy Graham	281
23. Steve Hughes	101	58. Adam Dawson.....	289
24. Maybern Planning	109	59. Kevin Woods.....	297
25. Catherine Hodge	111	60. Natural England	305
26. Dave Terry	119	61. Elizabeth Foy	306
27. Chris Brannan	120	62. John Atherton & Lynne Lomax	314
28. Chris Baugh	128	63. Peter Stansfield.....	316
29. Jack & Dorothy Norris	136	64. Dylan Woods.....	324
30. Wendy Grimshaw	147	65. Sharyn Mckittrick.....	332
31. Sharon Rumsam	148	66. Planware (McDonalds)	340
32. Margaret Burton	149	67. Grane Residents' Association	361
33. Samuel Whittaker	150	68. Kevin Bent.....	362
34. Mary & Roy Fletcher	158	69. Jason Norris.....	363
35. Gillian Whittaker	167	70. Kaye Abbott	371
		71. Christopher Turner	379

72. Mrs Turner	388	83. Rossendale Primary Care Network	498
73. Maybern (Westchurch Homes).....	397	84. SSA Planning (KFC)	500
74. Morgan Woods.....	400	85. David Graham.....	511
75. Marie Charlton	408	86. Edenfield Community Neighborhood Forum	513
76. Jonathan & Sonia Lofthouse	413	87. Pegasus Group (Taylor Wimpey) ..	554
77. CBRE (United Utilities).....	423	88. Roman Summer	581
78. Christine Hereward	473	89. Hall Park Residents' Association.	1119
79. Lead Local Flood Authority.....	474	90. Hourigan Connolly.....	1129
80. Victoria Holt.....	478	91. Turley (Peel L&P).....	1253
81. CBRE (United Utilities).....	483		
82. Phil Nelson & J Marsden	488		

Responses received after 5pm on Friday the 15th of October 2021

92. McDermott Homes	1368
93. Christine Catlin.....	1388
94. Gillian Whitehead	1398
95. Michael Bennett	1406
96. Chris Ashworth.....	1414
97. Caroline Mitchell	1422
98. Campaign to Protect Rural England	1423

Classification of Responses

Response Number	Name	Reference Number	Allocation / Policy Reference (if applicable)	Nature of Response
1	National Highways	Numerous	Numerous	Numerous
2	Historic England	Numerous	Numerous	Numerous
3	Michael Watson (Renaker)	-	HS2.39	Request the allocation of a housing site
4	Carlo Latronico	MM009	H3	Objection
5	Jason & Sarah Menzies	MM009	H3	Objection
6	Ian Francis	PM-05	H34	Map Amendment
7	Deborah Brown & Andrew Morris	MM009	H3	Objection
8	Elizabeth & John Finn	MM009	H3	Objection
9	Public Health Planning	MM038	-	Support
10	Tracey McMahon	MM009	H3	Objection
11	Historic England	Errata	-	-
12	Homes England	-	-	-
13	Katrina & Steven Meager	MM009	H3	Objection
14	J & H Walton	MM009	H3	Objection
15	Nicholas Cousins		H34	Objection
16	Deena Burns	MM009	H3	Objection
17	Sarah & Andrew Hardman	MM009	H3	Objection
18	The Coal Authority	-	-	-
19	Julie Baugh	MM009	H3	Objection
20	Jack Woodworth	MM009	H3	Objection
21	Richard Holt	MM009	H3	Objection
22	Sophie Schofield	MM009	H3	Objection
23	Steve Hughes	MM009	H3	Objection
24	Maybern Planning	Numerous	Numerous	Numerous
25	Catherine Hodge	MM009	H3	Objection
26	Dave Terry	MM009	H3	Objection
27	Chris Brannan	MM009	H3	Objection
28	Chris Baugh	MM009	H3	Objection
29	Jack & Dorothy Norris	MM009	H3	Objection
30	Wendy Grimshaw	MM009	H3	Objection
31	Sharon Rumsam	MM009	H3	Objection
32	Margaret Burton	MM009	H3	Objection
33	Samuel Whittaker	MM009	H3	Objection
34	Mary & Roy Fletcher	MM009	H3	Objection
35	Gillian Whittaker	MM009	H3	Objection

36	The Limey Valley Residents' Association	MM009	H3	Objection
37	David Foxcroft	MM009	H3	Objection
38	Andy Ashworth	MM009	H3	Objection
39	Phil Hackett	MM009	H3	Objection
40	United Utilities	MM048	ENV9	Support
41	Lisa Hunt	MM009	H3	Objection
42	Sport England	MM009	H46	Support
43	David Schofield	MM009	H3	Objection
44	Rossendale Civic Trust	-	-	Rossendale is not capable of sustaining the proposed housing / Farming has not been acknowledged
45	Wesley Mort	MM009	H3	Objection
46	Craig Scott	MM009	H3	Objection
47	Sally Dewhurst	MM009	H3	Objection
48	Mark Booth	MM009	H3	Objection
49	Christine Smithies	MM009	H3	Objection
50	Josh Sutton & Fiona Shaw	MM009	H3	Objection
51	Anne McKown	MM046	ENV7	Query / Support of closing paragraph
52	Home Builders Federation	Numerous	Numerous	Numerous
53	Carol Clement	MM009	H3	Objection
54	Nancy Kelly	MM009	H3	Objection
55	Mason Woods	MM009	H3	Objection
56	Philip & Gillian Amatt	MM009	H3	Objection
57	Dorothy Graham	MM009	H3	Objection
58	Adam Dawson	MM009	H3	Objection
59	Kevin Woods	MM009	H3	Objection
60	Natural England	-	-	-
61	Elizabeth Foy	MM009	H3	Objection
62	John Atherton & Lynne Lomax	MM009	H35	Concerns regarding methane, acid mine water and heavy metals contamination
63	Peter Stansfield	MM009	H3	Objection
64	Dylan Woods	MM009	H3	Objection
65	Sharlyn Mckittrick	MM009	H3	Objection
66	Planware (McDonalds)	MM038	R5	Objection
67	Grane Residents' Association	MM009	H64	Objection
68	Kevin Bent	MM009	H3	Objection
69	Jason Norris	MM009	H3	Objection
70	Kaye Abbott	MM009	H3	Objection
71	Christopher Turner	MM009	H3	Objection
72	Mrs Turner	MM009	H3	Objection
73	Maybern (Westchurch Homes)	Numerous	Numerous	Numerous

74	Morgan Woods	MM009	H3	Objection
75	Marie Charlton	MM009	H64	Objection
76	Jonathan & Sonia Lofthouse	MM009	H3	Objection
77	CBRE (United Utilities)	MM009	Cowm Water Treatment Works (prev. H69)	Gives supporting evidence for the re-instatement of the housing allocation
78	Christine Hereward	MM009	H3	Objection
79	Lead Local Flood Authority	Numerous	Numerous	Numerous
80	Victoria Holt	MM009	H3	Objection
81	CBRE (United Utilities)	MM009	H24	Support
82	Phil Nelson	MM009	H3	Objection
83	Rossendale Primary Care Network	-	-	Request infrastructure or financial support via s106/ CIL
84	SSA Planning (KFC)	MM038	R5	Objection
85	David Graham	MM009	H3	Objection
86	Edenfield Community Neighbourhood Forum	Numerous	Numerous	Numerous
87	Pegasus Group (Taylor Wimpey)	Numerous	Numerous	Numerous
88	Roman Summer	Numerous	Numerous	Numerous
89	Hall Park Residents' Association	MM028	NE2	Numerous
90	Hourigan Connolly	Numerous	Numerous	Numerous
91	Turley (Peel L&P)	Numerous	Numerous	Numerous
Responses received after 5pm on Friday the 15th of October 2021				
92	McDermott Homes	Numerous	Numerous	Numerous
93	Christine Catlin	MM009	H3	Objection
94	Gillian Whitehead	MM009	H3	Objection
95	Michael Bennett	MM009	H3	Objection
96	Chris Ashworth	MM009	H3	Objection
97	Caroline Mitchell	MM009	H3	Objection
98	Campaign to Protect Rural England	Numerous	Numerous	Numerous



Warren Hilton

[Redacted]

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

6th September 2021

Dear Sir / Madam,

Rossendale Local Plan Main Modifications Consultation

Thank you for inviting National Highways (formerly Highways England) to comment on the proposed Main Modifications to the Rossendale Local Plan (2019-2036).

Having considered Rossendale Council's proposed Schedule of Proposed Main Modifications, we make the following comments:

Main Modification 008 Policy HS2 - H62 – Land West of Market Street, Edenfield

We suggest that the wording of Paragraph 8 is amended as follows:

- Geotechnical investigations in accordance with the requirements of the Design Manual for Roads and Bridges will be required to confirm land stability and protection of the A56, and consideration paid to the suitability or not of sustainable drainage systems on the boundary adjoining the A56.

Reason:

To provide the clarity from the outset that this work will need to accord with this mandatory standard for works affecting trunk roads.

Main Modification 028 Policy NE2: Land North of Hud Hey, Acre

We suggest that the wording of Paragraph d is amended as follows:

- A new priority junction and access from Hud Hey Rd is to be provided. This will need to be based on the findings of a detailed geotechnical feasibility study of land stability and a full ground investigation survey in accordance with the requirements of the Design Manual for Roads and Bridges, and be subject to a Transport Assessment, including Road Safety Audit,

Reason:

To provide the clarity from the outset that this work will need to accord with this mandatory standard for works affecting trunk roads. Ground conditions typically encountered in this area are such that building upon this land may affect the stability of the A56 trunk road carriageway if not approached and undertaken with the appropriate care and knowledge.

Main Modification 028 Policy NE3: Carrs Industrial Estate North Extension, Haslingden

We suggest that the wording of Paragraph b is amended as follows:

- A suitably engineered highway access to an adoptable standard is to be delivered via Commerce Street with a site-specific ground investigation required to address potential geotechnical and geo-environmental risks in accordance with the requirements of the Design Manual for Roads and Bridges;

Reason:

To emphasise the significance of the need for there to be cognisance of the engineering challenges posed by the topography and geology of the designated access route. To provide the clarity from the outset that this work will need to accord with this mandatory standard for works affecting trunk roads. Ground conditions typically encountered in this area are such that building upon this land may affect the stability of the A56 trunk road carriageway if not approached and undertaken with the appropriate care and knowledge. These changes reflect the position taken by us in our Position Statement dated 2nd October 2020 that is enclosed with this letter.

We suggest that the wording of the second paragraph within the explanation subsection is amended as follows:

- Access to the site will need the full agreement of ~~Highways England~~ National Highways given its proximity to the A56, ~~a trunk road~~ and because they have a land interest. As well as transport issues developing this site will require detailed investigation of the geology and an assessment of how this will affect future development. ~~Highways England's~~ National Highways approval will also be required to ensure no adverse effects on the A56 in the future.

Reason:

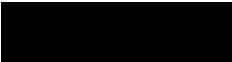
To clarify that agreement with us will be needed on both a technical level in relation to the design of the new access, but also for the use of land in the ownership of National Highways for development purposes to facilitate construction of the said new highway access.

Finally, Highways England was renamed National Highways on 19th August 2021 and so all references to Highways England throughout the proposed Local Plan should be replaced accordingly.

Whilst the changes we have suggested above are academic in nature, we do feel that they will assist in highlighting and understanding key aspects of the expected approaches to the site policies concerned. If the Council or the Inspectors accept any of the changes we have suggested. changes, but wish to amend our suggested wording of any of the alterations, we would be happy to discuss this.

Please contact me if you would like to discuss anything about this letter.

Yours faithfully,



Warren Hilton
North West Development & Planning Team





Rossendale Emerging Local Plan 2019 – 2034 Examination

Highways England Position Statement:

Access to Site NE3 – Carrs Industrial Estate North, Haslingden

Highways England's concerns regarding the proposal by Rossendale Borough Council (RBC) for a permanent access road to be created between Commerce Street, Haslingden, and the proposed land allocation NE3 of the emerging Rossendale Local Plan are well documented in our response to the Pre-Submission Local Plan and submission for the Inspectors' Matters, Issues and Questions.

Following the October 2019 Examination in Public, the Inspectors examining the emerging Local Plan requested that further work be done to address these concerns under Item 15.8 of the Local Plan Examination Schedule of Actions. As part of this, we note that that RBC subsequently commissioned MottMacDonald to undertake a desktop geotechnical study to identify potential highway access arrangements based on the widening and realignment of the existing unnamed highway accommodation access from Commerce Street that was created when the A56 Haslingden Bypass was built in 1980/81. This access crosses over land in Highways England's ownership forming the major engineered slope that has previously been discussed.

Highways England's prime consideration is safety, and so any proposed scheme affecting this land must not destabilise the slope and therefore pose a risk to the safety of the A56 trunk road, which is a critical national asset.

Having considered the MottMacDonald study report ("the study"), our overall view is that it provides a good background to the risks and issues associated with providing safe access across the land in our ownership that should inform a potential developer (providing that the report is made available to them). Indeed, the recorded presence of a landslide involving the section of the slope immediately to the south-west of that in our ownership also highlights the need to approach any scheme affecting the slope in both an informed and very careful way. We must point out however that the study does not highlight all of the risks present at this site; our site visit of 12th March 2020 noted the presence of a significant groundwater seepage issue at the foot of the slope above the existing access close to the junction with Commerce Street. This tallies with the referrals to seepage from previous construction and inspection records referred to in the report's Executive Summary and in Section 5.1. The likelihood is that this issue was not evident at the time that Mott MacDonal conducted their site visit for the study, due to it coinciding with the exceptionally dry spring of 2020.

An access can only be delivered safely provided that it is suitably engineered. The study does not contain the further detailed investigation and analysis required to identify the form of the suitable engineering necessary to create a safe and sustainable new access from Commerce Street.

We note from recent discussions that RBC does not intend to undertake any further work at this time (such as a ground investigation survey) to inform its assessment of the likely feasibility, form and cost of the road access arrangements suggested by the study. We therefore counsel RBC and any development interest(s) to ensure that appropriate due diligence regarding the slope as a whole is undertaken before decisions are made. Doing that may help avoid a situation where delivery of an appropriately engineered access solution is disproportionately expensive in relation to any development of the site. This is, of course, a risk for RBC and prospective developers of the site to be aware of and manage.

Any formal consent from Highways England (sale or Licence) for the use of its land in connection with any proposal relating to site allocation NE3 would therefore not be actioned until such time as detailed design matters pertaining to the use of our land are fully agreed between the promoting developer of site NE3 and Highways England. If not agreed prior to the granting of planning approval, this should form a planning condition of any development approval associated with the proposed NE3 employment land allocation.

For the purpose of finalising the emerging Rossendale Local Plan, Highways England could accept the principle of our land being used for the provision of a suitable access to development as identified for the proposed NE3 Local Plan site allocation on the following basis:

1. Highways England's prime concern is safety, and so any scheme involving the land in question would need to be designed and constructed in a way that would not destabilise the slope and therefore pose a risk to the A56 trunk road, which is a critical national asset.
2. Of the three access concept options presented within the study, in our view Option 3 (the westerly route) represents the best basis for the access road and could be safely constructed provided that it is suitably engineered. In our view, Option 3 is likely to present the least risk to delivery in geotechnical terms. It is the only access concept presented in the study that could be likely to be acceptable to Highways England. We note that the study does not in itself contain the level of further detailed investigation and analysis required to identify the form and extent of the suitable engineering necessary to provide an access road safely. The risk of an access not ultimately being able to be provided safely, or that the scope of the suitable engineering required is disproportionately expensive to deliver, is for RBC and any promoting developer of site NE3 to be aware of and manage.
3. The study report does not provide or offer any information as regards to the detailed design requirements of the Option 3 access concept (or any of the others for that matter). Further detail would therefore be required at planning application stage or through the discharge of an associated planning condition. Our recommendation is that this is scoped with Highways England prior to

submission of any planning application. Any access proposal would need to demonstrate full accordance with Standard CD622 'Managing geotechnical risk' of the Design Manual for Roads and Bridges.

4. The content and risks identified in the MottMacDonald study report must be acknowledged by both RBC and any developer of the proposed site allocation NE3.
5. Any proposals involving use of the land in which Highways England has an interest must be designed and executed taking into account:
 - the risks and mitigations outlined in the MottMacDonald study report;
 - the condition of the land and any ground issues present (either within the land or outside of it) that may affect the stability of the slope or improved highway, or that may pose a risk to the A56 trunk road at the time that Highways England may give legal consent for the use of its land by any other party in connection with the development of the land forming the proposed NE3 site allocation. This requirement may be incorporated into any legal agreement for the use of the land (sale or Licence).
6. The full length of the access road from Commerce Street to the land forming the proposed allocation NE3 shall be classed as Highway and that all features comprising of that Highway (for example, but not limited to carriageways, footways, lighting, drainage and safety barrier) are adopted by the local highway authority upon its completion.
7. No development of any land within Highways England's control could begin until:
 - Full design and constructional detail relating to the provision of the access road to site NE3 has been agreed in writing with Highways England and the local highway authority that is in accordance with the Design Manual for Roads and Bridges; in particular standard CD622 'Managing geotechnical risk'.
 - A separate legal agreement has been concluded to the satisfaction of Highways England for the use of its land in connection with the provision of a highway access to site NE3. The precise mechanism to enable use of the land would be determined by Highways England at a later date. This response should not be taken as an indication that heads of terms on any legal agreement with Highways England for the use of the land would be reached; irrespective of any planning approval granted. As part of this legal agreement, Highways England has a duty to the taxpayer and will seek financial compensation for the use of the land at an associated commercial rate.

Our comments above reflect the basis on which Highways England could now accept the principle of an access from Commerce Street in connection with employment site allocation NE3 being created. We believe that, subject to the acceptance by RBC of these principles, our position is now sufficient to enable progression of the emerging Rossendale Local Plan 2019 – 2034.

Highways England
2nd October 2020



By email: forwardplanning@rossendalebc.gov.uk

Our ref: PL000135162
Your ref:

Date: 8 September
2021

Dear Sir/Madam

Rossendale Local Plan – Main modifications consultation

Thank you for consulting Historic England on the above document.

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.

We have the following comments to make:

MM001, Local Plan Vision

Historic England objects to the proposed vision as it does not include reference to the historic environment, one of the core principles of sustainable development in the NPPF. It is therefore recommended that additional text be inserted (and would also tie in with the following objectives, which includes reference to the historic environment).

Proposed change: Insert reference to the *historic environment*.

MM001, Local Plan Objectives, Environment

Historic England objects to the proposed bullet on the historic environment as it only seeks to enhance, rather than conserve and enhance in line with the requirements of the NPPF. Therefore, it is recommended that additional text be inserted.

Proposed change: Insert reference to *enhance*

MM009 Housing Site Specific Policies

Historic England objects to the proposed amendments to the site-specific policies. The Council has undertaken a series of heritage impact assessments to support the inclusion of the sites in the plan. It is expected that the policies include reference to these to tie in their recommendations and design requirements. This will ensure that the sites can be developed without harm to the historic environment, in line with the requirements of the NPPF. The proposed changes to the policies, only refer to the need to submit a new heritage statement and impact assessment, without ensuring that the mitigation measures already identified to reduce the harm are included within the development requirements.

Proposed change: Therefore, it is recommended that where relevant, an additional line should be included which states, *development will be in accordance with the mitigation measures outlined in the Council's Heritage Impact Assessment.*

MM028 Employment Site Specific policies

Historic England objects to the proposed amendments to the site-specific policies. The Council has undertaken a series of heritage impact assessments to support the inclusion of the sites in the plan, it is expected that the policies include reference to these to tie in their recommendations and design requirements. This will ensure that the sites can be developed without harm to the historic environment, in line with the requirements of the NPPF. The proposed changes to the policies, only refer to the need to submit a new heritage statement and impact assessment, without ensuring that the mitigation measures already identified to reduce the harm are included within the development requirements.

Proposed change: Therefore, it is recommended that where relevant, an additional line should be included which states, *development will be in accordance with the mitigation measures outlined in the Council's Heritage Impact Assessment.*

Additional Modifications

No comments.

Policy Map Modifications

No comments.

Historic England has provided a separate response to the sustainability appraisal (see letter ref: PL00755564).

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

Yours sincerely,

E.Hrycan

Emily Hrycan

Historic Environment Planning Adviser (North West)
Historic England

[REDACTED]



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England

By email: forwardplanning@rossendalebc.gov.uk

Our ref: PL000135162
Your ref:

Date: 8 September
2021

Dear Sir/Madam

Rossendale Local Plan – Sustainability Appraisal Main Modifications consultation

Thank you for consulting Historic England on the above document.

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.

We have the following comments to make on the sustainability appraisal:

Sustainability of Main Modifications

MM001

We disagree with the proposed SA score and the supporting text. In view of our comments on the Vision and the Objectives, the proposed Main Modification will have a high major adverse impact (--) on SA objective 2 (Cultural Heritage).

MM009

We disagree with the proposed SA score and supporting text. In view of our comments on the Housing Site Policies, the proposed Main Modification will have a high major adverse impact (--) on SA objective 2 (Cultural Heritage).

MM028

We disagree with the proposed SA score and supporting text. In view of our comments on the Employment Site Policies, the proposed Main Modification will have a high major adverse impact (--) on SA objective 2 (Cultural Heritage).

We have provided a separate response to the main modifications (see letter reference PL000135162). If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

E.Hrycan

Emily Hrycan

Historic Environment Planning Adviser (North West)
Historic England



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England

By email: forwardplanning@rossendalebc.gov.uk

Our ref: PL000135162
Your ref:

Date: 16 September
2021

Dear Sir/Madam

UPDATE: Rossendale Local Plan – Sustainability Appraisal and Main Modifications

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.

Following on from a meeting held between Anne Storah (Rossendale BC) and Emily Hrycan (Historic England) on 16 September 2021, Historic England would like to provide an update to clarify our position on our comments. (Please see letter reference PL000135162 and PL000135162).

Whilst we disagree with the SA score for MM001, MM009 and MM028, this is in the context of the proposed amendments that are required. Without the amendments, we consider that the policies (as drafted) would not have a positive impact on the historic environment; but a negative.

Should the changes be made as suggested by Historic England, then we consider that the policies would have a positive impact on SA Objective 2 (Cultural Heritage). We would then support the content of the Sustainability Appraisal (as currently drafted).

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

Yours sincerely,

E.Hrycan

Emily Hrycan
Historic Environment Planning Adviser (North West)
Historic England
E-mail: [REDACTED]



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.





Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Dear forward planning team at Rossendale Council,

The below email sets out a comment/appeal on the exclusion of the land known as 'Land at Holme Lane, Haslingden' (formerly of the reference HS2.39) from the Housing Site Allocations within the current Emerging Local Plan.

Please note that the exclusion of this site appears to have taken place between 2018/2019 but this was only recently noticed by myself and the land owner (Jonathan Ofield) whom I am acting for. We therefore set out the below appeal to your planning officer Jacob Landers in July-2021; however, we were informed that we need to send this appeal for consideration during the Schedule of Proposed Main Modifications consultation phase (which I can see we have now entered following your email dated 03 September 2021 13:48).

Please therefore treat this email as a formal comment/appeal to your Schedule of Proposed Main Modifications consultation process which is open until 15/10/2021.

Appeal for Land at Holme Lane, Haslingden to be included back into the list of Housing Site Allocations within the Emerging Local Plan

Myself and Jonathan (copied in) were in contact with you back in 2016 regarding a piece of land in Jonathan's ownership. The land is at Holme Lane, Haslingden, and has the title nr. LAN35527. We paid for some pre-application advice with yourselves in Nov-2016, at which time you talked us through the emerging Local Plan. One of the things we discussed was that although our land was in the Greenfield area, we felt that this wasn't appropriate.

Following the above meeting, we did however have some good news in the draft local plan dated Aug-2017 whereby our site was included in the list of sites allocated for housing. Our site had the reference HS2.39.

Shortly after this point we put the site on hold as we were not ready to take it forward at that time. Unfortunately, however, in July 2021 we became aware that the site is no longer allocated for housing within the latest draft local plan. We therefore queried why this was with your planning officer Jacob Landers and within an email dated 06 July 2021 14:28 we were informed that this was because the site was not identified for release within the Green Belt Review 2016.

In Nov-2016 we had already become aware that the site was not identified for release in the Greenbelt Review dated Nov-2016 because of the fact that the site scored 'Strongly' against the 'Purpose 2' criteria within this report which was 'To prevent neighbouring towns merging into one another'. Myself and the land owner, Jonathan, paid for pre-planning application advice and had a meeting with your planning officers in Nov-2016 where this was discussed at length. From this point onwards we pushed for the site to be taken out of the greenbelt, and then in July 2017, we, perhaps naively, thought that this matter was accepted and concluded when in the draft local plan, dated July-2017, our site was allocated for housing.

It is important to point out that the Green Belt report dated Nov-2016 preceded the allocation for housing of the site which came about in Jul-2017; no doubt as a result of us challenging the Green Belt review 2016's findings at that time. I am therefore confused as to why the site was taken out of the next drafts of the local plan in 2018/19 when we had already successfully disputed the findings of the 2016 Green Belt report.

This decision or mishap appears to have taken place Aug-2018..... at this point we had mothballed our interest in this site; and it is for this reason that you did not hear from the Land Owner or myself in order to raise this issue, until now. In the statement of consultation dated Aug-2018, the site was included in the below table titled 'sites not taken forward'... but what is odd is that it was the only

HS2.34	Land Rear of Highfield Nursing Home	0.25		2	Years 1-5	Greenfield	UB	Self-Build	Site not going forward	Yes for 2 dwellings			Potential land contamination, historic landfill (EA). Existing permission for 2 dwellings, below the Local Plan threshold.
HS2.39	Land at Holme Lane, Haslingdon	0.18	0.18	5	Years 6-15	Greenfield	GB	Housing	Decision not yet taken	No	X41 and 464	300m	Green Belt not identified for release in the Green Belt Review...
HS2.44	Land at Hollin Lane, Rawtenstall	2.59		51	Years 6-15	Greenfield	CS	Housing	Site not going forward	No			Access issue via Hollin Lane which is a narrow single lane with no possibility of widening

site which actually states 'Decision not yet taken' in the regard, as highlighted below:

For this reason, I genuinely believe there may have been an oversight here as I believe we had buy-in from Rossendale Council (within 2017) that the site should be allocated for housing.

I would therefore again like to reiterate that we strongly dispute the findings of the Green Belt review dated 2016 in relation to our site, which has site reference Nr. 20. This report was completed by a Consultant named LUC, who were hired by Rossendale Council. It's important to note that the site wasn't recommended for release in this report only because it scored 'Strong' within the 'Purpose 2' criteria:

Parcel ref	Purpose 1a	Purpose 1b	Purpose 2	Purpose 3	Purpose 4
20	Not Applicable	Not Applicable	Strong	Weak	No Contribution

'Purpose 2', and the 'Strong' rating definition is detailed below:

Table 2.2 Assessment Criteria for Purpose 2

a) NPPF Green Belt Purposes	b) Issue(s) for consideration	c) Criteria	d) Ratings	e) Comments on assessment	
2 To prevent neighbouring towns merging into one another.	Reduction in visual or physical gaps between settlements.	Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?	Strong	The parcel plays an essential role in preventing the merging or erosion of the visual or physical gap between settlements. Loss of openness would cause visual or physical coalescence or substantially reduce the gap.	This purpose seeks to prevent settlements from merging to form larger settlements. The PAS guidance states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Two key elements are therefore used - the extent of a) the visual and b) the physical gap. This may also include consideration of perceptual issues.

The key aspect of purpose 2, as highlighted above, is the 'Loss of openness'.

As we pointed out in 2017, it is clear to us that because 'Purpose 2' is the only area where the site scored anything significant (i.e. 'Strong' or 'Moderate') that there has been a clear mistake within this report because the site in question does not provide any physical openness whatsoever. The best way I can describe/evidence this is by showing you the attached 'Appendix 1 - Neighbours Plan' which I have put together.

This plan evidences that:

- 1) Our site is landlocked by the following:

- i) Residential development to the immediate West of the site; see land highlighted dark blue with title nr LAN28297.
 - ii) Lorry park to the immediate East of the site; see land highlighted red with title nr LA502690.
 - iii) Nursery and further housing to the immediate South of the site; see land highlighted pink, orange and light blue with title nr.'s LA503996, LA587445 and LA903948 respectively.
 - iv) Highways land and roads to the immediate North of the site.
- 2) The site itself is completely non-visible by any member of the public passing by on foot or on vehicle on any used highways or pavements within the area. The only highway owned routes where it is possible to walk or drive down is the B6527 Manchester Road and the A56 Haslingden Bypass. I.e.:
- i) When on the B6527 Manchester Road, the site is completely blocked by the presence of the Nursery, the existing terrace houses, and the lorry park. – See **Appendix 2** for evidence of this.
 - ii) When on the A56 Haslingden Bypass, the site is completely blocked by the high raised Highway owned land which sits between our site and the Haslingden Bypass. It is very important to note here that the existing 4-storey Edenhurst Apartments are also non-visible from the Haslingden Bypass. This is because both our site and the Edenhurst Apartment site are on a much lower level than that of the Haslingden Bypass and the Highways owned land which sits between these sites and the road. – See **Appendix 3** for evidence of this.

To conclude on the above points – the findings of the Green Belt Report 2016 is clearly incorrect in assessing the site as ‘Strong’ for the ‘Purpose 2’ criteria, which by nature, required the land to be visible by passing public in order for the site to contribute to preventing neighbouring towns from merging into one another. Furthermore, if the site was accepted for planning I doubt we would get more than 4 storeys of residential block(s) approved – and even this would not be visible to passing public (as evidenced by the Edenhurst Apartments being non-visible from the A56 Haslingden Bypass).

The above points are strengthened further by the fact that there is no open/unused land anywhere around the site to the immediate North/West/South/East; as evidence within Appendix 1.

Can I finally ask that you can raise the above points to whoever best suitable within your organisation so that we can get this matter corrected. It is our strong opinion that this site will be wasted if it is not allocated for housing as it does not have any characteristics which contributes to the Green Belt criteria whatsoever.

Thanks you very much in advance for your attention on this matter.

Regards

Michael Watson

1st Floor, NQ Building, 47 Bengal Street, Ancoats, Manchester M4 6BB

This e-mail is confidential and may be privileged. It may be read, copied and used only by the intended recipient. If you believe that you have received this e-mail in error, please contact the sender immediately on 0161 245 1150. Please note that all references to “this e-mail” in this disclaimer include this e-mail and any associated attachments. **WARNING:** It is the responsibility of the recipient to ensure that the onward transmission, opening or use of this message and any attachments will not adversely affect its systems or data. Please carry out such virus and other checks as you consider appropriate. No responsibility is accepted by Renaker Build Limited or any associated companies/subsidiaries in this regard.



Holme Lane, Haslingden
Neighbouring Properties to LAN35527

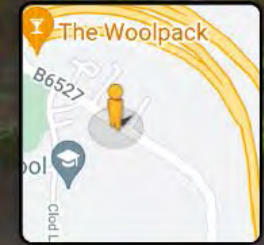
Key:

- = LAN35527, Jonathan Ofield
- = Highways owned land
- = LA502690, Alden Green Limited
Michael Soloman, Lorry Park.
- = LA903948, Mary Moden,
552 Manchester Rd, Semi-Det. house
- = LA587445, Jon & Alison Pickstone,
550 Manchester Rd, Semi-Det. house
- = LA503996, Halliwell Homes Limited
548 Manchester Rd, Nursery.
- = LA542939, Halliwell Homes Limited
Nursery car park.
- = LAN28297, EdenHurst (Bent Gate)
Ltd, Edenhurst Apartments freehold.
- = LA703535, Ian Warbuton, 2-24 Bent
St, 12nr terrace houses freehold.
- Bent St = Private road owned partly by
LAN28297 and LA703535.
- Holme Lane = Highways road, i.e. Council owned.

550 Manchester Rd
Haslingden, England

Google

Street View



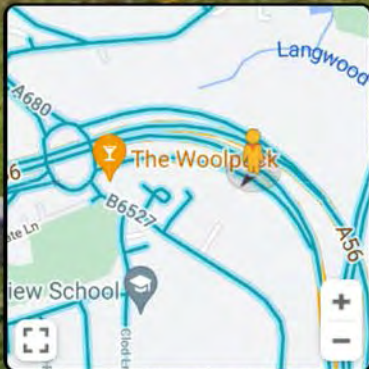
Google



A56
England

Google

Street View



Google

To whom this may concern,

I am writing in relation to the proposed pre planning application Proposed Local Plan Application, H5, land West of Swinshaw Hall.

I wish to heavily object and raise the below concerns please as a homeowner of property [REDACTED]

- Traffic disruption: Burnley Road is already an extremely busy road, with multiple cars passing through each day. This is also a major commuting route into Manchester by cars and by bus. Additional properties would mean additional cars on the road and would extend journey time for all drivers.
- General disruption: As a household that has all of its residents working from home, the construction work proposed would cause major disruption to our ability to conduct our own work. Having constant access to water, electric and internet is crucial and any form of disruption would be financially damaging.
- Waterworks: the pre-planning application states that the waterworks would need to be completely redeveloped to sustain the proposed houses. We would not want to be affected by this and would contest any disruption, whilst also being concerned by flood risk due to the field being on a steep decline.
- Loss of Privacy/Overlooking: as above, the field behind our house is on a steep decline, meaning any houses built would substantially decrease our privacy and we would be completely overlooked. This would also be the case for the new properties as we would be able to see directly into the new development's houses.
- Amenities in local area: Loveclough has no shops or amenities. Considering the large work taking place behind Commercial Street, is it wise to add another 69 properties? Traffic would only increase throughout the day as people would have to drive for basic goods, adding to an already extremely busy commuter line.
- New access point causing additional traffic: The pre-planning application states that a new access point would need to be developed due to Goodshaw Lane being insufficient and a bus stop would have to be moved to accommodate this. The disruption to Burnley Road would be significant and will only add to what can take minutes to join the road currently. I note the work being done near Crawshabooth and the disruption this is causing to traffic, even during lockdown.
-

I understand the need to develop new properties as we are in a household shortage, but I firmly believe that the disruption that would be caused to enable an unsuitable, steep field to become sufficient for housing far outweighs the Rossendale Emerging Local Plan requirements for additional housing.

Please can you confirm receipt of this email via reply.

Kind Regards,

Carlo Latronico

To whom it may concern,

I am writing to put forward our objection to the proposals to develop the aforementioned land at Loveclough into dwellings.

As homeowners whose property directly borders the proposed site, we have grave concerns about the potentially severe detrimental effect development will have on us.



The above photograph illustrates the rear of our property, looking east towards SHLAA 16207 of the proposed site. As you can see, the supporting random stone boundary wall is some 3 metres below the ground level of the field.

In instances of heavy rain, snow, and frost, the saturating water makes it way through the ground and a substantial amount escapes through this wall.

It is our fear that the use of heavy machinery on this field would disturb the earth to a degree that our wall could be damaged, collapsed, or destroyed. Even a single stone falling from the wall would be fatal to our young son.

In the 178 page pre-application document there is no mention or reference to soakaways, irrigation, flooding, or geology, therefore I feel the effects on the current residents have not been considered by the developers.

Speaking of our son, due to the ground level difference between our property and the proposed site, his bedroom window (from which the above photograph was taken), would be exposed to any onlookers. This is a serious invasion of privacy. Not to mention such a

pleasant view would be ruined forever. Furthermore, the noise of a construction site that would be inflicted so close to a 1 year old's window is inhumane.

Goodshaw Lane, which is a popular walking route with locals, would undoubtedly be the route taken for heavy goods vehicles and machinery access the building site. In its current state it is not suitable for frequent heavy traffic of this kind of vehicle. It is narrow, bumpy, steep in places and has several adverse cambers. Furthermore, if the additional estimated car journeys per day in the report are to be considered, even a proposed new junction would not necessarily stem the flow of traffic in the vicinity; Goodshaw Lane would inevitably become a rat run at peak travelling times. As mentioned, it is a popular walking route, and additional traffic on this narrow road would be an accident waiting to happen.

On traffic, despite the existing pedestrian refuge point, as a resident I can tell you that it does very little to slow down traffic. On a daily basis we can hear cars flying past our house with no regard to the speed limit. Residents in Loveclough have been crying out for the speed limit on Burnley Road to be reduced from 40mph to 30mph for a long time, yet the council has yet to find the evidence necessary to make this change. Adding more traffic and potentially another junction is simply put gambling with people's lives.

I hope these valid objections are reasonably assessed and considered on your path to rejecting this egregious and unnecessary defilement of our healthy countryside.

Kind regards

Jason & Sarah Menzies



Dear Mr Landers,

From.

Ian Francis



Please include everything below as a submission for the Forward Planning Group to include in the Responses to the Main Modifications Consultation.

Dear Sirs,

I have been informed that the map of H34 – Land off Cowtoot Lane within the recent ‘Schedule of Policies Map Modifications’ shows "the whole site boundary of the allocation". As I pointed out, in the ‘Housing Update, August 2021’ and ‘Action 10.7 the developable area has been reduced and is clearly marked on the map there. I advocate that to avoid confusion the modified Action 10.7 map should have been used in the ‘Schedule of Policies Map Modifications’ for H34 (previously H39) so as to avoid confusion.

Kind Regards

Sent: Mon, 6 Sep 2021 9:01

Subject: RE: Rossendale Local Plan - Main Modifications Consultation

Good morning Mr Francis,

Thank you for your comments and sorry for any confusion caused. The map of H34 – Land off Cowtoot Lane within the recent ‘Schedule of Policies Map Modifications’ (what you have included as EXHIBIT A) refers to the whole site boundary of the allocation.

The moorland fringe area of the site is still within the allocation boundary, but as you rightly pointed out, in the ‘Housing Update, August 2021’ and ‘Action 10.7’ (and illustrated in your EXHIBIT B) the developable area has been reduced.

The area developable for housing has not changed and all figures stand as they do in ‘Action 10.7’ and in the ‘Housing Update, August 2021’.

I encourage you to look at ‘EL12.002 – Schedule of Proposed Main Modifications to the Local Plan’ here: https://www.rossendale.gov.uk/downloads/file/16813/el12002_-_schedule_of_proposed_main_mods_to_the_local_plan On pages 52-54 you will find the site specific policy drafted for H34, and on line 5 we are proposing that “A landscape buffer zone using native species is created along the boundary of the Moorland Fringe landscape type identified within the site”.

I hope this has cleared up any confusion but if you have any further queries then please do not hesitate to get back in touch.

Kind regards,
(Forward Planning)
Rossendale Borough Council

EXHIBIT A


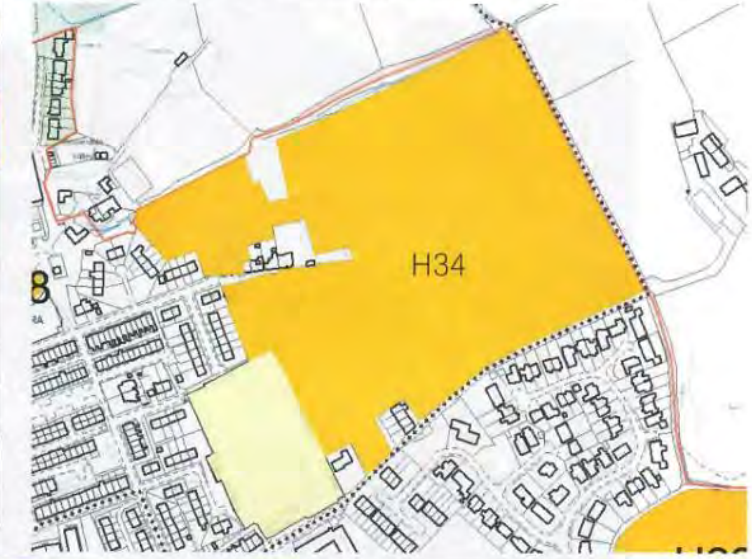



Boundary Ref	PM-05	Previous Boundary ref (if applicable)	UB(Major)8
Address	Land off Cowtoot Lane, Bacup		
Proposal	New proposed housing allocation boundary at Land off Cowtoot Lane, Bacup		
Map Key			
Submission Version Site Boundary			
Main Modifications Site Boundary			
Existing Green Infrastructure			
Maps are not at a standard scale			
Crown copyright and database rights [2021]. Ordnance Survey [100023294]			
Reason for change	To exclude the football club and playing field from the proposed housing allocation.		

EXHIBIT B

Figure B: Revised site and developable for site allocation H39



© Crown copyright and database rights [2021] OS [100023294]

In respect of the LDP for Rossendale, allocation H5.

We live on [REDACTED].

We have concerns about **all** of the development that has been proposed and the overall impact along Burnley Road A682 and the surrounding greenbelt.

Our main concerns are as follows:

- We have noticed that traffic on Burnley Road A682 has increased in recent years particularly at peak times. This will increase further as a result of the significant number of new homes proposed, in this locality, in the LDP. I note the application suggest 1 car every 2 minutes will enter/leave the site. However add this to all the other proposed developments and existing housing along Burnley Road, and the impact on traffic flow will be immense particularly as it is the only main road on this side of the valley. We have already seen the mayhem caused when there has been an accident/snow/roadworks and traffic has built up to cause considerable delays and gridlock.
- We are concerned about the potential for even more development along Burnley Road towards Burnley once this ball has begun to roll. We have seen this happen along Hollin Lane between Middleton and Heywood for example, where the two towns are slowly merging into one.
- There are public right of way /footpaths in our local area and the whole valley. These must remain open. There is one down the side of Swinshaw Hall.
- We are very concerned about the environmental impact on wildlife, natural habitats, trees, hedgerows and woodland in the valley due to increased development. We have observed the recent tree felling at a nearby site and we are concerned if this happens at several sites that this could add up to significant loss of mature trees and the species they sustain within the valley. We are concerned that the type of tree which is planted to replace felled trees will not be appropriate to support wildlife in the same way as those lost (native species). We must preserve the hedgerows and dry stone walls which support wildlife but are also a huge part of the heritage and charm of the area.
- Flooding is always a concern in the valley.
- The X43 is the *only* bus service along Burnley Road and as such should not be seen as a selling point to support development along Burnley Road.
- There are few affordable homes within these developments which prevents people on lower incomes and some families from buying homes within the area where their support networks reside e.g. parents and family.
- There is always a concern about increased pressures on services particularly the GPs and schools. The pressure on GPs is particularly noticeable especially since the pandemic began. We do not believe the pandemic is solely to blame for the difficulties faced when trying to get appointments with GPs and we understand its a complex issue however more families in the area will increase the burden further.

Regards,

Deborah Brown and Andrew Morris.

Sent from [Mail](#) for Windows

From: Elizabeth Finn [REDACTED]
Sent: 19 September 2021 22:30
To: Planning
Subject: Objection to the proposed development at Swinshaw Hall Loveclough

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

September 19th 2021

RE: MM09 H3 Swinshaw Hall Loveclough

I write to you in relation to the planning application that has been proposed for the land adjacent to Swinshaw Hall.

Contrary to pre-application guidance on the Government website which recommends “Pre-application engagement with the community is encouraged” the landowner and Developer has shown complete disregard for local residents as they have not sought any dialogue with local people. This highlights to me that landowner and developer have no intention of collaborating with the local community or care about the impact they are having.

I have lived in Rossendale for 35 years and have been involved in community since moving here and as a result I will fight on behalf of the community against a development which will bring significant detriment to myself and other local residents.

I have read in detail the 178 page document that has been submitted and took great interest in noting not once was the perspective of local residents included. The report has not

considered the noise pollution and road safety amongst others which will make this an unviable development.

Road Safety

The new development proposes an entrance replacing the current bus stop on Burnley Road. As you will be aware the council has recently approved 80 houses which are currently being built to the west side of Burnley Road (opposite this development). This means that within a space of less than 200 metres there would be three junctions feeding c.240 houses (at least 480 cars). This is traffic that would all be trying to get on to an existing already very busy Burnley road (the main route from Burnley to Rawtenstall) a 40mph zone. The three junctions being so close would undoubtedly result in congestion and subsequent accidents. How would the children and the elderly of all these houses be expected to cross the road safely with all this traffic?

This junction and the traffic island directly outside the proposed new junction has constantly been a black accident site. More traffic will only increase the danger.

I live on a small unadopted lane which feeds directly onto Burnley Road just down from the proposed development. Access to Burnley Road is already dangerous without the added volume of traffic. Also the noise from the traffic from heavy lorries will increase and no doubt have great detriment to the road surfaces.

Crawshawbooth is too narrow to take an additional volume of traffic. Burnley Road is already congested so the addition of cars from this new estate will only make things worse as it routes through the bottle neck. I would also suggest that

Burnley Road from Clowbridge should be re designated as 30 mph.

Over development of local area

As mentioned previously the council has already agreed to significant development within the direct vicinity of this housing. This is a rural area that is being significantly over developed and one has to question where this will end?

Loveclough is a village with NO facilities. We do not have a shop let alone doctors. Crawshawbooth School is significantly oversubscribed every year as is St Paul's Constablee and this development would only add pressure to already overstretched resources in Rossendale.

I have noted that the development would have to contribute to more parking in Crawshawbooth. I would dearly like to know where they are going to find the land to provide this parking. Moreover it states the Developers MIGHT have to provide a contribution to provide for additional Education and Health provision.

I would suggest strongly that if this development went ahead the Developer would be expected to pay a substantial contribution to Crawshawbooth School as well as providing premises for a doctor and dentist all of which are heavily over subscribed.

The above points alone determine reasons why this development should not go ahead.

Your Faithfully
Elizabeth and John Finn

Sent from my iPad

Forward Planning Team,
Rossendale Borough Council,
Buisness Centre,
Futures Park,
OL13 0BB

Lancashire County Council
County Hall
Fishergate
Preston
PR1 8XB
Date: 04 October 2021

Consultation response for Reference MM038

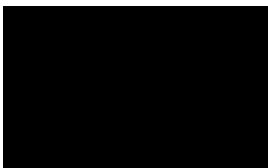
Dear Planning Inspector,

Lancashire County Council's Public Health Team welcomes the opportunity to provide feedback on Rossendale Borough Council's draft Schedule of Proposed Main Modifications for their Local Plan.

One of our roles is to inform Local Plan Policy making. This recognises the impact that built and natural environments have on health and wellbeing and its relevance to the requirements of the National Planning Policy Framework. It is in this context that our feedback is provided.

We support the planned changes to Policy R5: Hot Food Takeaways (Ref MM038). The proposed policy aligns to our Public Health Advisory Note by limiting the opening of new hot food takeaways within 400m of a secondary school and in wards with high obesity rates. This is an important policy to help tackle rising obesity levels and to promote healthy communities.

Yours sincerely



Dr Sakthi Karunanithi MBBS MD MPH FFPH
Director of Public Health

Re; PRE-APPLICATION PROPOSED LOCAL **PLAN** ALLOCATION H5 LAND WEST OF SWINSHAW HALL, BURNLEY ROAD, LOVECLOUGH.

I would like to object to the above **planning** taking place.

This would have a direct impact on my home, looking at the **plans** the development is going to come right up to my boundaries, have an impact on my privacy, thus then having a detrimental impact on the value of my home.

I am also extremely concerned about the flood risk, this year there have been several occasions that my garden has become a waterfall, and the built up on the bottom garden area, which nearly came into my home, having a housing development in the field will only cause this to become worse, and as I'm at the bottom of the gradient, I will be left with the devastation consequences.

Wildlife - the wild life I see some and go in this field is numerous, bird life seems to be growing year on year, this will diminish with yet another building project. What will happen to the hedger sets?

Traffic and parking- the parking situation from the school house upwards has grown drastically in the last year or so, especially with cars from the apartments that used to be the glory pub, the developer of these was asked to make private parking. This has not happen, and this was requested I think 2 years ago. Recently due to the other new development off commercial st, commercial st residents have had to park on Burnley rd, this has to be Frank caused chaos, then we have the extreme weather, when this occurs all cars park of Burnley from all the estates, causing double parking, blind spots, parking of pavements- risk to pedestrians.

With the already proposed development in loveclough we are going to be looking at another 200 cars, with this development of 69 plus 22 houses - thats an extra 160 plus cars as most households now have 2 cars.

Plus only 2 miles away at reedshomes are another 100 or so houses, so all this extra traffic in a 2 mile radius. This route when the country is not in lock down is already under pressure, traffic build up easily.

I think the council needs to take peoples mental health into consideration, this has been proven even more so this last year. This route along goodshaw Lane is one of the most used walks for people and dog walkers, surrounded by trees and grazing land, sheep's, then the lambs in spring all have a positive impact of the local peoples mental health, this is gradually being taken from people and we will be surrounded by brick, the community that currently supports each other will be gone, as it will be a sea of people who just get their cars for their drive to Manchester, as there houses will not be affordable for local people, if this was about local housing, there are many local areas in rossendake that are suitable sites and are areas that need regeneration, and development as the buildings are derelict, but those areas don't have the price tag of loveclough.

Infrastructure- before more homes are built, they need school places, GP places, we don't even have a [local.shop](#) in loveclough... nearest on is about 1 mile away. So guess what that means more cars on the road, as you can't just walk to the shop, the post office the chemist.

Please consider the negative impact t this is going to have on our area, not everywhere has to become like suberia, people come to live in loveclough or stay to live somewhere with a community, countryside, wildlife, not to look a brick, that is no longer in keeping. Lovecloug will look like a large car park.

Also I'm concerned for the security of my home, currently the back of my home and a few others is only accessible over a field, with this new development, the back of my property with be accessible, meaning I am more likely to be broken into. I know personal issues are not highly regarded, but all this will have a negative impact on the price of these houses.

Privacy- the boundary seems to be close to my boundary, windows could be in direct sight of my windows, blocking out light especially in winter.

Over looked in garden due to the hight of any houses being built.

Kind regards

Tracey mcMahon



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

Direct Dial: 0161 242 1423

Our ref: PL00756903

6 October 2021

Dear Mr Forward Planning

Rossendale Local Plan Main Modifications and Evidence Base

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 documents. At this stage we have no comments to make on the content.

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

Yours sincerely,

Emily Hrycan
Historic Environment Planning Adviser (North West)





Homes England

Forward Planning Team
Rossendale Borough Council
Business Centre
Futures Park
OL13 0BB

By email: forwardplanning@rossendalebc.gov.uk

7th October 2021

Dear Sir / Madam,

Rossendale Local Plan - Main Modifications Consultation

Homes England Response

As a prescribed body, we would firstly like to thank you for the opportunity to comment on the above consultation.

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

08.10.2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the

conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Katrina and Steven Meager

Mr and Mrs Walton

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

09/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

J. Walton & H. Walton

Jonathan and Hayley Walton

████████████████████
████████████████████
████████████████████
████████████████████

Nicholas Cousins

9/10/2021

Tel:

E mail:

Dear Sir

Having expressed my objections to Rossendale Borough Council's plan to develop land formerly noted as H 39 but now it appears designated H 34, i.e. the land opposite Cowtoot Lane (letter dated 21st February 2021) I now wish to comment further on the proposed main modifications to the local plan arising from the documentation in examination library 12 on the Rossendale Borough Council website. My comments on the local plan are focused on the land now designated H 34 – the land opposite Cowtoot Lane. I have five objections to make. These are as follows:

1) The land off Cowtoot Lane has been redesignated 'H 34' when it was previously 'H 39'

I fail to see why the land in question has had to be redesignated. This is no mere administrative trifle. Given the local opposition to the Council's plan to develop the land – those wishing to keep abreast of developments relating to it are going to assume that the land will maintain its administrative reference. If the administrative reference is changed those concerned about the development of the land may assume that the apparent disappearance of the reference signifies that the Council has dropped its plan to develop the land. It seems odd, therefore, to say the least that changing the land's administrative reference should have been undertaken as this could easily mislead. Of greater concern is the fact that the change in reference was not clearly and explicitly marked in any of the documentation in examination library 12. Instead on page 34 of E12.002 'Schedule of Proposed Main Modifications to the Rossendale Local Plan Publication Draft Plan (SD023)' the reference 'H 39' is crossed out to be replaced with 'H 34'. Thereafter one is led to assume that the land has been redesignated as H 34. This hardly equates to transparency when it comes to keeping the local electorate abreast of plans to develop areas of land for residential and/or other use.

2) The nine provisos to the land now designated H 34 do not reference the safety of children

Pages 43-44 of E 12.003 'Rossendale Local Plan 2019 - 2036 Schedule of Proposed Main Modifications to the Rossendale Local Plan (September 2021)' reference access in provisos 1 and 2 with special reference to disabled people. I find it astonishing that no reference is given to the safety and well being of children, resulting from the proposal to create 94 dwellings, with the increased volume of traffic that this will entail. In my letter of 21st February 2021 I cited the safety of children as the main objection to the proposal to develop the land. As I pointed out the land proposed for development will be opposite Bacup Thorn Primary School and Bacup Nursery School. The former has a school capacity of 276, the latter 110. Access to any housing development in plot H 34, would necessitate either the use of Cowtoot Lane, where the school is located or Gordon Street. As I also pointed out access via the latter, Gordon Street, would involve vehicles passing a children's play area immediately off Gordon Street. Exacerbating the threat to the safety of children is the fact that Gordon Street is a narrow road. I reiterate that I am bewildered that the safety of children gets no special reference in the list of provisos.

3) There is no reference in the provisos to protection of rights of way

In the explanation to the provisos on page 43 of the aforementioned document it states that *The Local Highway Authority would favour the site being accessed from both Cowtoot Lane and Gordon Street with the internal estate road of the development providing links between the two.* As I pointed out in my letter of 21st February the suggestion by the highway authority that an internal estate road be built to link access to the proposed housing development to/from Gordon Street and Cowtoot Lane must impact upon rights of way. Currently there is a footpath that runs alongside the area classed as H 34 affording access to the Irwell Sculpture Trail. Any such building development would presumably impact upon the footpath. It is difficult to see how this right of way could therefore be maintained.

4) No reference has been made in the provisos to historic rights of pasture farming

As I stated in my letter of 21st February 2021 the area H 34 proposed for development would necessitate terminating the right of the tenant farm at the top of Gordon Street to graze cattle on the land. The livestock cattle farm at the top of Gordon Street has been in the hands of the same tenant farmer family for over 100 years. Any such development in the area proposed would be a direct threat to the livelihood of the family. I am assuming that if the plans go ahead to develop the land the Council will presumably create some form of meaningful compensation package for the family affected.

5) The Lives and Landscape Assessment of 2017 rejected any such plan to develop much of the land designated H 34

As I stated in my letter of 21st February 2021 The 'Lives and Landscape Assessment for Rossendale Borough Council Volume 2 Site Assessments of July 2017' stated that only a fraction of the area proposed for development by Rossendale Borough Council was suitable for development, '*with appropriate mitigation*' which included tree planting. The Assessment explicitly stated that the much of the land now earmarked was unsuitable for development.

I am grateful that the nine provisos go some way to addressing other objections that I and others have raised regarding the development of land now designated H 34. I am relieved that a flood risk assessment, an ecological assessment and a coal mining risk assessment are to take place amongst other assessments. I would urge strongly that the Council consider objections 2 to 5 contained in this letter. I would also urge the Council to state clearly and explicitly in e mail correspondence or on the relevant web page that certain areas of land earmarked for development have undergone administrative redesignation. This will make communication and correspondence easier. I note that on page 26 of 12.007 the 'Rossendale Local Plan Examination Update August 2021' the date for the first 20 dwellings for land designated H 34 has been pushed back to 2024/25. This seems sensible as it gives more time for the various assessments to take place. I must though reiterate my strong concern that the land is being considered for development in the first place. I would urge, as I said in my letter dated 21st February 2021, that brownfield sites be prioritised for housing development within Rossendale.

Yours faithfully

Nicholas Cousins

Deena Burns

[REDACTED]
[REDACTED]
[REDACTED]

10/10/2021

Dear Sir/Madam

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional

cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this

isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Deena Burns

Mr and Mrs Hardman



10th October 2021

RE: Rossendale Local Plan MM009, EL12.002 H3 Swinshaw Hall

I write to you in relation to the latest modifications made to the Rossendale Local plan and the site specific policies relating to H3 Swinshaw Hall. As was made apparent in my previous objection, the inclusion of this greenbelt land in the local plan is one that has no benefit to the local area and will bring significant detriment to both my family and other local residents.

I have read in detail the 15 site specific policies outlined for this land and they are a token effort from the council to get this land passed and look like they are responding to the planning inspectorate. My specific concerns are outlined over the following pages:

3. A transport assessment is provided demonstrating that the site can be safely and suitably accessed by all users...

A transport assessment does not go far enough to mitigate the impact on the highways that this development would have. The new development proposes an entrance replacing the current bus stop on Burnley Road. As you will be aware the council has recently approved 80 houses to be built to the west side of Burnley Road (opposite this development). The diagram below shows that in a space of less than 200 metres there would be three junctions feeding c.220 houses (440 cars). This is traffic that would all be trying to get on to an existing already very busy Burnley road (the only road taking traffic from Burnley to Manchester) a 40mph zone. The three junctions being so close would undoubtedly result in congestion and subsequent accidents. We have witnessed two significant accidents within this year alone and this will only increase with additional housing putting lives at risk.



8. A Landscape Assessment is submitted with details relating to layout, design and landscaping showing how the development would respect the landscape character of the site and the views into and from the site

- Desolating open meadows and farmland by building 47 houses upon it means that the landscape is not respected but instead destroyed. No landscape assessment will be able to mitigate for this
- In addition the new development will result in a complete lack of privacy for our house as outlined below, again a landscape assessment cannot mitigate for this, the only thing that can stop this is for the land to not be developed.

(Diagram highlights points below noted)



Point A: The proposed development would result in our property being encased by roads to 75% of our house. making our house the equivalent of a traffic island. Assuming the 47 houses had two cars each we would have a minimum of 94 cars directly passing our garden daily. The trees proposed would in no way mask this and result in a complete lack of privacy. Any car passing at point A would have a full view into our house. Photo below taken from point A.



Point B: The boundary for housing runs directly next to our garden wall. The photo below is taken at ground level from point B, (we assume the houses will be two storey). From point B our house will be directly overlooked with full view into our kitchen, lounge and bedrooms. Note all our bedrooms are on the ground floor. This is in addition to completely overlooking our garden. From point B the ground steeply declines meaning any new house would have full visibility into our house and us into theirs and there would be no way that some token shrubbery could mask this. Photo below taken from Point B.



I have taken these photos from our perspective house perspective but due to the steep nature of the land this would impact all houses adjacent to the development on Burnley Road.

Point C: Again the proposed development would directly meet our fence. Assuming a two storey dwelling this would not only impact our privacy but block all light to our three bedrooms on this side. The side of our house is south facing meaning any development would directly block all light.

Below picture shows the view of our house from any new property at Point C



9. A Tree Impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on site

We know that this condition is not enforceable as has been seen at the 'woodside' development in Rawtenstall. Protected woodland was felled despite this being outlined as an area of woodland on their plans. Fines for felling such trees are negligible for builders who do not care about the local areas they are building in and are focussed on profit.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigation measures necessary

We have had to invest significantly in drainage to our garden, as can be seen by anyone walking around the area significant water flows off the fields of this development. How would a risk assessment ensure that houses such as ours that have sat here for hundreds of years are not flooded and left with thousands of pounds of damage as a result?

11. A new on site open space is provided which leads to equivalent or better provision of open space in the area. The onsite open space should provide a functional park land setting for Swinshaw hall with details of an onsite play area in accordance with the perimeters plan below.

Loveclough park is directly next to this proposed development. What needs to be ensured is that alongside this parkland setting Loveclough park is not left to become derelict and is invested in. The park is currently very neglected by Rossendale Council and with the 47 houses proposed here alongside 80 currently being built is going to be very overused.

14. A contribution to the creation of car parking provision within the centre of crawshawbooth.

Again this point does not go far enough and is a token gesture. A 'contribution' could be a paltry financial contribution or the making of one additional space? Crawshawbooth is virtually impassible during the day with cars continuously parked on the double yellow lines. Where could a new car parking provision be built? There is no vacant land within the village of Crawshawbooth and shows this condition has been put in without any understanding of the local area.

15. A contribution towards increased school provision within the area (if identified as necessary)

As per above a 'contribution' is not enough. This is a get out clause for a builder who will give Crawshawbooth primary school a token amount of money that will do nothing. The school is already oversubscribed, the catchment area for the school means that if you live in Crawshawbooth you are unlikely to be offered a place as the catchment area focusses North only. There are simply not enough school places to accommodate another 47 houses (plus the 80 already approved) and having a school limited on space can only impact our children's education.

We hope the above points will be taken into account as currently the conditions are not fit for purpose. This is a rural area that is being significantly over developed and one has to question where this will end?

Your Sincerely,

Sarah and Andrew Hardman



The Coal
Authority

Rossendale Local Plan - Main Modifications Consultation

Contact Details

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

[Redacted]
[Redacted]

[Redacted]
[Redacted]

Date

11 October 2021

Dear Sir/Madam

Rossendale Local Plan - Main Modifications Consultation

Thank you for your notification received on the 3 September 2021 in respect of the above consultation.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

I have reviewed the Main Modifications proposed and can confirm that the Planning & Development Team at the Coal Authority have no specific comments to make.

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)

Mrs Julie Baugh
344 Eccleshall Road
Stafford
ST16 1JN

11TH October 2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036), my brother and family live in this area and I wholeheartedly disagree with this development.

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Julie Baugh

[REDACTED]

12/10/2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Jack Woodworth

Hello,

Further to this objection email I would also like to point out that I live in one of the houses in extremely close proximity to the area that it has been proposed is built on and I feel as though my right to light and privacy will be affected by any houses that are built here as they are overlooking us!

Thanks
Jack

[REDACTED]

11/10/21

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Richard Holt
11/10/21

[REDACTED]

12/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the

conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Sophie Schofield

Hello,

Further to the objection email below I would also like to point out that I live in one of the houses in extremely close proximity to the area that it has been proposed the houses are built on **and I feel as though my right to light and privacy will be affected by any houses that are built here as they are overlooking us!**

On my 5 minute drive home I have from Alder Grange School where I work I already pass 2 sites that are in the process of building 50+ new houses on each of them, I fail to see the logic or reasoning in building anymore when schools are already full to capacity before these 2 are built! Let alone this 3rd one behind my house you are now proposing!

Thank you,

Sophie

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

11th October 2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before

the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Stephen Hughes.

Forward Planning
Rossendale Borough Council
Business Directorate
Development Control
Futures Park
Bacup
Lancashire
OL13 0BB

12 October 2021

Dear Sir/Madam

Representation To:

- **Schedule Of Main Modifications - Rossendale Local Plan (2021-2036); and**
- **Housing Update Paper**

Representation on Behalf of Mr D Connor
Carr Barn Cottage, Hardman Avenue, Rawtenstall, BB4 6BB

On behalf of Mr D Connor, part landowner of housing allocation H14, Land at Carr Farm/Carr Barn, Rawtenstall (previously site H18), we hereby submit a representation to the "*Schedule of Main Modifications*" to the Rossendale Local Plan (2019-2036) that is on consultation by Rossendale Borough Council (RBC) until 15 October 2021.

We also make comment to the "*Housing Update to March 2021*" that has also been released at this time.

Please note that representation in respect of this allocated site was submitted to the consultation on "*Matter 8.3 Density*" and "*Matter 8.4 Evidence of Optimised Density on Allocated Sites*" via MCI Developments Ltd.

Schedule of Main Modifications

MM09 – Housing Site Specific Policies

From review of the consultation report, MM09 "*Housing Site Specific Policies*", proposes new policies for the Local Plan for certain housing allocations, including H14, Carr Barn and Carr Farm. The proposed policy text includes the text:

- Development up to 25 dwellings will be supported ... provided that
- 1. A Transport Statement is submitted taking into consideration the impact of the development on the capacity of the Rawtenstall Gyratory..
- 2. A Heritage Statement and Impact Assessment is provided
- 3. A landscape buffer zone using mature planting is created along the eastern and southern boundaries...

Initially the allocation of the site is supported by the landowner. However, the number of units referenced for the allocation at 25 no. is subject to further objection and the allocation unit number should be increased to “at least 50 no.” across the whole of the allocated land area (which encompasses a further landholding to our client’s land also).

The previous representation to the consultation on Matters 8.3 and 8.4 (MCI Developments), that a higher number of units is possible to be accommodated on the site is not considered to have been adequately considered and addressed by Officers, with only reference to ‘heritage issues’ and ‘landscaping’ noted in the Response Report ref EL8.008.3 “*Schedule of Actions Matter 8 Approach to Site Allocations and Green Belt Release*”. No detailed review or response to the representation by RBC appears to have been undertaken.

The MM09 additional policy text via the three criteria that the site should be subject to the submission of a Transport Statement, Heritage Statement and landscape buffer is also objected to as being excessive and unnecessary as a specific policy in the Local Plan.

The requirements of the National Planning Policy Framework would invoke that such information elements are standard requirements and would be necessary to consider and submit alongside any future planning application. Similarly, the Local Validation List for planning applications in Rossendale would encompass such requirements. It is not therefore considered necessary to duplicate the requirements of relatively standard planning information inputs for a site of this scale and nature in the Local Plan policy context.

Other proposed housing allocations in the emerging Local Plan (including significantly larger sites) are not proposed to have site specific policies, therefore it is considered this site should follow such similar process.

MM08 – H2 Housing Allocations

Objection is made to the number of units and site specific policy reference in the table to this policy in respect of the above points to site H14.

We would kindly request confirmation of receipt of this representation to the Main Modifications.

Housing Update Paper

It is noted that the Council are contending that a 5 year supply is present having regard to proposed housing allocations being delivered alongside significant numbers of planning permissions granted over the next 4 years. It is however questioned whether the numbers identified in the Paper will be delivered as quickly as indicated given past under delivery.

Representations by others on housing land supply and delivery issues have highlighted such issues and we would again anticipate similar concerns being raised by others to this Update Paper.

Please do not hesitate to contact me should there be any queries on this representation.

Yours Faithfully,



Sarah Jones
Associate Planning Consultant
For and behalf of Maybern Planning and Development



12/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Catherine Hodge

Would like to register strong objections to proposed housing development at Lovelough. Far too much development and no infrastructure completely ruining the village

Sent from my iPhone

Mr chris Brannan

8-10-2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the

conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

☐ The 2017 Local Plan Appendix A: Proposed Changes references the following

"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need"

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

☐ In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed "uneconomical" for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.

☐ There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair?

There were c 5,000 empty properties across the Valley(2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the

Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroomhouses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- ☐ 5 bed detached – 5 in total
- ☐ 4 bed detached – 27 in total
- ☐ 3 bed detached – 12 in total
- ☐ 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- ☐ 2 bed semi mews – 10 in total,
- ☐ 3 bed semi mews – 10 in total
- ☐ 4 bed semi mews – 2 in total
- ☐ 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village. "Site accessed safely" is an issue with driver visibility being a significant problem. "The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road." The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road.

3ii) The local road infrastructure

The pre-planning document commented that the "local road were driven" and "site analysis" was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is "loose" to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”, Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough

Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children's safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents.

The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Mr Chris Baugh



11TH October 2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036), my brother in law and his family live in this area and I wholeheartedly disagree with this development.

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Chris Baugh

\

[REDACTED]

12th October 2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at

the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed "uneconomical" for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair?

There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references "off-market" discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that "the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required". I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village

“Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue.

There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

- 7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.**

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

- 8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.**

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

- 9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.**

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

- 10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.**

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents.

The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Jack and Dorothy Norris

Object to further house building at Swinshaw Hall , Loveclough from Mrs W A Grimshaw [REDACTED]

Sent from my iPhone

Objection

Mrs Sharon Rumsam [REDACTED]
Sent from my iPhone

Object to housing at Swinshaw Hall . Mrs Margaret Burton [REDACTED]
[REDACTED]

Sent from my iPhone

[REDACTED]
[REDACTED]
[REDACTED]
12/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Mr Samuel Whittaker

Mr Mrs Roy fletcher

12/10/2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as "degraded" giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not "degraded" it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before

the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references "off-market" discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that "the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required". I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

3. **A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the only access road through the village. "Site accessed safely" is an issue with driver visibility being a significant problem. "The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road." The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road.

3ii) The local road infrastructure

The pre-planning document commented that the "local road were driven" and "site analysis" was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is "loose" to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object to but did include the following extract.

*"The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**"*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of "free from development"?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other "High Susceptibility" properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children's safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely



Mary Angela Ann Fletcher

[REDACTED]
[REDACTED]
[REDACTED]
12/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Mrs Gillian Whittaker

**REQUEST FOR PRE-APPLICATION FEEDBACK
PROPOSED LOCAL PLAN ALLOCATION H5
LAND WEST OF SWINSHAW HALL, BURNLEY ROAD, LOVECLOUGH**

Development of Proposed Local Plan Ref H5

The proposed erection of up to 69 dwellings and associated open space on the above site at Swinshaw Hall.

The **Limey Valley Residents' Association** has noted the above request from the developers to Rossendale Borough Council and would like to make the following observations.

1. The **LVRA** has made representations to RBC regarding this site following the publication of the SHLAA listing together with a number of grounds for objecting provided by numerous residents of Loveclough, Goodshaw and Crawshawbooth. These comments are held on file by RBC and essentially the objections were on traffic, infrastructure and ecological grounds. The LVRA still maintains these concerns and objections.
Our current notes on the current Request for Pre-Application Feedback are as follows.

2. Building Density/Ecology

SHLAA Ref 16205 – Cornfield South of Swinshaw Hall (p.405 in Appendix E)

Total area .53ha Developable area .47ha **Potential Yield 14 properties** (at 30 per ha)

SHLAA Ref 16206 – Swinshaw Hall (p.408 in Appendix E)

Total area 1.16ha Developable area 1.04ha **Potential Yield 31 properties** (at 30 per ha)

The site is also situated in a Stepping Stone Habitat for grassland identified on the Lancashire ecological network map. It is thought that development on the site can be mitigated by keeping a grassland area on the site to protect this important habitat, thus the area available for development has been reduced by 50% to keep a parcel of the grassland habitat. The land is within the Settled Valleys landscape character type and the site specific landscape assessment concluded that the site is suitable for development within mitigation.

SHLAA Ref 16207 – Land to the north of Swinshaw Hall (p.412 in Appendix E)

Total area .91ha Developable area .81ha **Potential Yield 24 properties** (at 30 per ha)

The site has ecological value as it is identified as a grassland Stepping Stone Habitat on the Lancashire ecological network map. The site is within the Settled Valleys landscape character type, however an independent landscape study concluded that the site is not suitable on landscape grounds. The site is not considered to be suitable now for housing development, due to its ecological and landscape value. However, if some ecological and landscape value can be maintained with appropriate mitigation, then the part of the site can become suitable in the future

Total area 2.6ha Total Developable 2.32ha **Total Potential Yield 69** (at 30 per ha)

However, due to the ecological value of area 16206 and 16207 the recommended yield should be reduced collectively by around 50% according to SHLAA calculations.

Thus the recommended yield should be as follows: 16205 = 14; 16206 = 16; 16207 = 12. Total yield should be in the region of 42 properties.

According to the Indicative Plan for development on page 178 of Binder 1, 16206 seems to be entirely undeveloped on ecological grounds. Thus the yield for the remaining two areas would be 28 properties in total.

The proposed development of 69 properties would more than double the recommendations as outlined in the SHLAA and would be almost three times the recommended figure if 16206 were to remain undeveloped.

The estimate proposed in Binder 1 of 59-69 houses at 35 per ha fails to take into account the requirement to reduce the number by 50% due to its ecological and landscape value. The aforesaid estimate of 42 would be more realistic.

3. Infrastructure

Whereas there is no objection on traffic grounds from LCC and the plan indicates proximity schools and medical surgeries, the statements have been made in isolation and without regard for other local sites. Given the nearby development to the west of the A682 for 80 properties and further south the Taylor Wimpey development at Reedsholme for 100+ dwellings the pressure on traffic movement and education and medical facilities will be excessive.

With reference to traffic, Binder 1 explains that TRICS data suggests that, in total, 69 dwellings will result in the generation of approximately 295 vehicular trips per day on average (4.28 per house per day). During the morning and evening peak hours this equates to around 1 vehicular trip (arrival or departure) every 2 minutes. Highways Advice suggests that this level of traffic can be accommodated on the local highway network without any detrimental traffic impact. What TRICS data fails to do is to take into account the aforementioned proposed developments which according to TRICS calculations will result in an additional 342 daily movements from the nearby Loveclough site and over 428 from the Reedsholme development. This total is in excess of 1000 vehicle movements per day. *This figure is in addition to the current level of traffic moving along the A682 from settlements at Badgercote, Goodshaw, Reedsholme, Holins and Crawshawbooth etc, together with the through traffic from Burney to Rawtenstall and beyond.* The resultant bottleneck at Rawtenstall is both predictive and inevitable. The 295 through traffic from movements associated with these proposals will contribute significantly. Indeed the **Local Plan Highways Capacity Study** of 2018 identifies the Rawtenstall Gyratory as a significant point of congestion associated with the **2019-2034 Local Plan**. Clearly this identified the A682 as potentially a major traffic issue.

Similarly an additional 140 school places and 280 extra surgery and dentist enlistments together with those from the aforesaid new developments will place unprecedented pressure on those services.

4. Archaeology

There have been historical connections between the area and the Society of Friends (Quakers). Local knowledge suggests a pre-18th century Quaker burial ground in the vicinity of this site. Quakers were not renowned for keeping details of their burials and almost never identified the graves of their deceased members with any marker. The developers should be aware of this possibility and a full search and investigation is undertaken before starting. It would be most unfortunate if the first sign of such a site was revealed heavy machinery.

5. Wildlife

Badgers are present on the site. A live sett can be seen and others may be in situ. Appropriate actions would need to be taken to protect against disturbance.

6. Flooding

There has been an historical problem of flooding in the area. During periods of heavy rain, the A682 is regularly flooded at the junction with the track to Broad Ing Farm resulting in problems for traffic. Additionally the properties to the north of the Old Schoolhouse are often faced with flooded rear yards/gardens caused by run-off from the site in question. Additional properties on the site are likely to exacerbate the problem with a reduction of soakaway provision.

7. Parkland

There appears to be an issue surrounding the parcel of land to the south of the site belonging to RBC. This contains a general area which for many years has been a public play area adjoining Loveclough Park. There is no clarity as to whether this parcel of land is to be made available for development or will remain in public ownership for public enjoyment. There is also the matter that 3 public footpaths cross this land which are well used adding to the public's pleasure of the area.

Conclusion

That there will be some form of development at the Swinshaw Hall site would appear inevitable. RBC's allocation of H5 as a potential site indicates a wish on their part for building to take place. What causes grave concern is the density of houses with the resultant problems as identified above.

The LVRA would ask that the housing density on the two zones mentioned in the Masterplan be adjusted on line with recommended density and taking ecological balance into account.

Whilst matters of flood risk (as mentioned in SHLAA), ecology could possibly be mitigated, the pressure on an inadequate infrastructure would be disastrous and would likely have a long-term negative impact on the area. It is noted that at a public meeting with the Inspector following the publication of the SHLAA, several potential developers deemed the site to be unviable on the basis of access and flood risk.

Indeed, RBC has recognised several of these issues and Lives and Landscapes (Refs. 442 110; page 6) and states that "*In general there needs to be an appreciation, that these areas are already some of the most densely developed in Rossendale, and that their scope for further developments is limited by the gradients of their enclosing valleys*" (Ref. 442). Also Ref 110 states that "*When progressing the development plan and future policies, LPAs should consider the impact of new development and the availability of infrastructure capacity infrastructure deficiencies exist, it is preferable to try and seek an alternative location. If this is not possible, consideration should be given to co-ordinating the delivery of the development with the delivery of infrastructure*".

Given the above, it would be preferable that no development takes place on this site but should that not be, then development approval should be deferred to coincide with the delivery of sufficient levels of infrastructure.

Submitted for consideration by The Limey Valley Resident's Association

References

SHLAA 2017 - Appendix E Sites Assessment (RBC)
Binder 1 – 2020-0014 (Roman Summer)
Lives and Landscapes – 2013 (RBC)
Local Highways Capacity Study – 2018 (RBC)

Hello

In relation to the latest publication of the local plan I'm disappointed that the proposed restrictions on land around Swinshaw Hall are not strong enough. There is nothing around required investment and improvements to local highways, the need for all properties to have electrical vehicle charging points and stronger protections for the wildlife. The site map effectively splits the development in two which will be even more damaging to the area. The land should not be included in the plan.

Across all other sites it is disappointing that conditions to state development would be acceptable haven't all been updated to ensure sites are fit for the future by including electric vehicle charging points as a condition of development in all instances.

David

David Foxcroft



13/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Andy Ashworth

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

13/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Phil Hackett

Thank you for consulting United Utilities as part of the latest Main Modifications Consultation.

We can confirm that we have no additional comments to make as part of this consultation and would like to welcome the wording as part of Policy ENV9.

There are some modifications to the site layouts and trajectory as part of this consultation. We would be grateful if shapefiles with the updated trajectory can be shared at your earliest convenience to update our GIS data.

Regards,



Adam Brennan
Planner
Planning, Landscape and Ecology
United Utilities
M: [REDACTED]
unitedutilities.com

If you have received a great service today why not tell us?
Visit: unitedutilities.com/wow

Let's keep life moving



Get plenty of
fresh air



Regular
testing



Have your
vaccinations
when offered



Continue to wear
a face covering



Wash your hands

13th October 2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

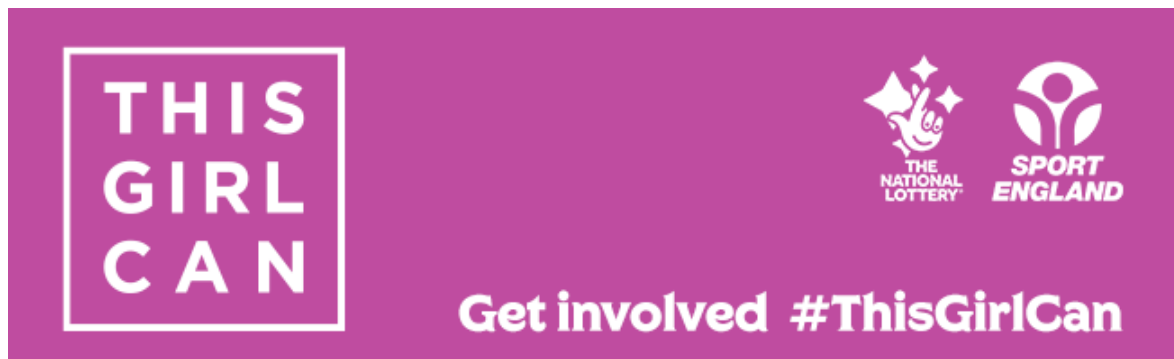
From: Fiona Pudge (Planning Manager – North West)
Organisation: Sport England
Address: Sport Park
3 Oakwood Drive
Loughborough
LE11 3QF

Main Modification: MM009
Policy H46 (formerly H52) Haslingden Cricket Club, land off Private Lane

Support: I can confirm Sport England, after consultation with the England and Wales Cricket Board, has worked proactively with the Council to agree the wording of policy H46.

Kind Regards

Fiona Pudge BA(Hons) BTP MRTPI
Planning Manager – North West



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
12/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

David Schofield

For the Attention of the Inspectors.

Having been present at the Inquiry into the Core Strategy, having followed the progress of the Plan through its various stages and, with our former Vice Chairman Brian Michael, reported back after consultation with our members and colleagues, I wish to make the following statement about the proposed District Plan on their behalf.

Firstly, it is felt that the demands put on our area for housing are beyond what it is naturally capable of sustaining. Our geography and topography are complex, with land formation and natural usage very much lacking in detailed, meaningful study. Much of it is not suitable for house building or industry as it is unstable, affected by flooding and water catchment that alleviates flooding, or inaccessible due to steep gradients or existing historic development.

It is regrettable that allocations of building land have had to be made by our Council on grounds of meeting Government imposed figures without meeting common sense criteria. Objections have not, are not, and will not be made simply on grounds of 'nimbys' or fear of losing views and recreational facilities. We are getting to the stage where far from being 'nimbys', it is being realised through experience that we have very few, if any, back yards left to contribute. Continued building on unsuitable sites will, whilst apparently solving problems on paper, only build up future problems on the ground.

Secondly, it has been noted more frequently of late that the care and maintenance of our landscape by many hundred years of farming has not been adequately recognised by the Plan: farming was once a major industry in the Valley and is now struggling to survive. Although this may not have been given attention during the evolution of the Plan, it may well be classed as a serious oversight that is now beginning to be noticeable by its effect on the farming community and our landscape as a whole, and I have been asked to bring this to your attention.

I trust that you will, in your overview of the details of the Plan, bear these points in mind as background essentials.

Yours faithfully,

Kathy Fishwick (Chair, Rossendale Civic Trust)

Dear Sir/Madam

Please find this letter as objection to the planned building of residential properties adjacent to Goodshaw Lane encompassing the land beside Laneside Farm and Swinshaw Hall. My objection is based on a number of principles as follows:

The initial Lives and Landscapes consultation included a plan for 10 residential properties to be built on the land at the back of Laneside Farm between that property and Loveclough Park, this land was selected purely because it is owned by Rossendale council and they would stand to profit from the sale. This parcel of land received the most objections to any of the proposed building sites in Goodshaw. The result of the strong objection was not that this parcel of land was removed from the plan but that the site was expanded to include land all the way to the end of Goodshaw Lane and an increase to the number of proposed dwellings by c400%.

The impact assessment that has been completed does not give any consideration to either Laneside Farm, Laneside Barn or Laneside cottage all of which are properties which will be directly impacted and will have new residential properties bordering their land. The residents of these properties have not been included in the consultation process in any way.

The planned site includes land owned by 4 different parties of which 3 have a vested interest in planning being granted – these include Rossendale borough council who are apparently independent arbiters of the planning process. There is clearly a conflict of interest which goes beyond RBC's anecdotally well known cosy relationships with building companies in the area.

Furthermore there has been little to no overt engagement with the people of the area since the revised plan was issued, no clear process for objection or timeframe for objection, no signs on lampposts. One would almost think the council are trying to sneak this through ? in fact this email address was distributed by people wishing to object via a flyer as it is impossible to find on the council planning website.

I would also suggest that there is sufficient brownfield sites across the valley to meet the required number of homes unless of course there is an interest from building companies who would find it easier and more profitable to sell houses in green field sites that require a movement of the country side boundary. Once again it feels this is more driven by the desire of RBC to line their pockets rather than take best care of the valley.

Whilst we write this objection we are aware that a party who was in dispute with RBC around the sale of an adjacent piece of land (specifically that the party is disputing ownership of some of the land that forms part of the plan) has already been told by the council that they will settle this dispute by financial settlement if he removed his assets off the disputed property. Given the council are willing to make a financial settlement for land, which should this planning application not be successful, would be worthless suggests that, from the council perspective at least, this is a done deal and the objection and voting process is meaningless.

In final comment it should also be noted that Swinshaw hall is not the only property of heritage in the Area – Laneside Farm is equally reflected on the earliest Ordinance Survey maps and is thought to date back to the 1770's not that any thought has been given to retaining the local astetic of the area.

Get [Outlook for iOS](#)

Craig Scott



13th October 2021

Submitted as attachment to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036) as I believe it negatively alters the character of the area.

General Comments

After reading the list of requirements for planning to be approved it seems that parts of the documents are no longer available which I think should be published in advance to allow local residents more opportunity to object before a final decision is taken on the development. It feels like the development is now being rushed through without appropriate due diligence and consideration to existing residents.

It also appears that some brownfield sites have been removed but not the greenfield sites which seems like the wrong direction to take. I believe we should be protecting the natural countryside and use brownfield sites for housing. The original pre-planning document classed the land as "*degraded*" giving a view to the reader that it is not worth keeping and that development is a much better option, which I disagree with. The area is a beautiful rural village, which if this development goes ahead I believe will be lost. The land is not "*degraded*" but would benefit from better land management to maintain natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important than ever before to protect the environment, preserve areas such as these for future generations and for the sake of the planet.

The land is important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development could add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which I feel will have a significant negative impact to the already restriction to traffic flow along Burnley Road.

It appears that surveys of the land were undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes me concern as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need"

I am not aware of a significant local need in Loveclough that justifies this development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which appears to have been ignored and not referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed *"uneconomical"* for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered.
- Previously published documents have stated there was substantial housing estate across the Valley that is empty. I believe it could be more economical and environmentally friendly to renovate existing buildings as opposed to expanding and developing on the natural beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which I find worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references "off-market" discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that *"the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required"*. The 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / Commercial Street from the information available online are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are:

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with approximately 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on an existing very busy Burnley Road, the main route from Burnley to Manchester which also accommodates significant HGV traffic currently 24 hours a day. This road is also a 40mph road and is the **only access road** through the village

“Site accessed safely” is an issue with driver visibility possibly being a significant problem. *“The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.”* The three junctions so close together would create additional congestion and potentially create an accident black spot. Crossing the road safely is a significant issue. There have already been many near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road (and pavement), double parking and parking on bends has significantly increased over the last 12 years, a lot of home owners have 2 cars or more, some are using their off road parking areas (rented from landowners) for a mobile home or caravans and even for general storage. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road as they are known to do. This impacts on driver visibility and access to Burnley Road. I have witnessed buses and HGVs unable to get through when vehicles are left parked in this manner.

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was significantly lower than normal traffic levels and certainly with the schools closed. This was not a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Consideration should be given to providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road.

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

I believe that building a significant access road, roundabout and dwellings does not fall within the definition of “*free from development*”.

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Looking at the plan for the layout of the access road, I believe there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties on Broad Ing and the back of the School House. This may impact significantly on the occupiers of the building and impact their health, well-being and privacy.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have tree preservation orders and these natural habitats should be maintained. This is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods along Burnley Road, so drainage is an issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which also regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on

Burnley Road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too. For the last 18 years I have witnessed excess water gathering at the foot of Goodshaw Lane flooding one half of Burnley Road during periods of heavy rain. Drivers have a tendency to hit this water at speed causing a large wave to be thrown up to the opposite side of the road. Large amounts of gravel also wash down Goodshaw Lane on to Burnley Road and create a “hump” which can be a hazard to vehicles. LCC have been prompt however, at clearing this when it is reported.

The path between Loveclough Park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”.

There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

Page 130 of the pre-planning document discusses protecting the land immediately to the west of Swinshaw Hall – would further development be considered in this area if the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

Loveclough Park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park with no explanation of the impact on children’s safety if the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not appear to consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

This appears to be missing in the pre-planning application and remains one now that proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area to making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

This is a document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the

proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not appear to meet the local need criteria outlined by Rossendale Council. The pre-planning document, although long and difficult to read, does not provide key information for residents to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development should not be given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Craig Scott

Sally Dewhurst



Sent By E-mail To:
forwardplanning@rossendalebc.gov.uk

13th October 2021

Re: EL12.002 MM009 H3 Swinshaw Hall, Loveclough (formerly site H5)

Dear Sir/Madam,

Please find below my comments on the 15 conditions attached to site H3 Swinshaw Hall for your consideration:

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation:^[SEP]

The indicative Swinshaw Hall site plan (figure 1 on P42 of document EL12.002) shows a landscaped buffer zone to the Southern Edge of the site bordering Hameldon Road (indicated by the blue arrow below). I request that this area be left wild (or appropriately landscaped) and the top edge of it before the developable area starts be planted and screened appropriately in recognition of the privacy and minimizing the impact on the existing residents of Hameldon Road. Please can the Council **add this to the site specific policy** to ensure that developers do NOT push the boundaries of the developable areas to take away this 'green buffer zone'.



2. **The development is implemented in accordance with an agreed design code:** [SEP]

Any development on this site should be in keeping with the surrounding buildings in both size and architectural style. Properties at the Southern end of the site should be limited to bungalows in consideration of the vast majority of properties on the Hameldon Road boundary being true or dormer bungalows with bedrooms located at the rear. Other properties on the site should be limited to 2 storey overall. Again, I ask that this be **included in the Site Specific Policy.**

3. **A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of a suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures, such as relocation of the bus stop:**

There are glaring issues when considering this site in planning for the additional highways capacity. These are:

- There is only one access road into and out of Loveclough (i.e. Burnley Road) so it simply cannot cope with the additional level of traffic from all the developments in the area.
- Developments have already been approved and are underway at The Woodside (97 homes by Taylor Wimpey) less than 2 miles away and The Foothills (80 homes by Hollins Homes) almost opposite to the Swinshaw Hall site, which have not been referenced. To then add the Swinshaw Hall site into the Rossendale plan at 47 homes adds at minimum of 224 cars to this one access road and family homes are being built so in reality they are likely to have more than one car per residence.
- In addition to the extra congestion, which has not been mitigated in any plans released by the Council, there are also significant road safety concerns arising from inclusion of the Swinshaw Hall site in the local land plans. The site access would be very close by to 'The Foothills' meaning two new major housing developments adjoining onto Burnley road in close proximity. In winter, cars park on the main road from the existing housing estates blocking it further physically and reducing site lines as people struggle to get their cars up the hills to their properties through snow and ice. In addition, road safety and parking is already a serious issue around Crawshawbooth Primary, which this will exacerbate further.
- The traffic surveys completed in earlier versions of the Rossendale local plan were undertaken during the COVID

pandemic when most people were working from home under a Government directive and school were closed. This is not reflective of normal level of traffic and does not consider the impact of including further developments such as Swinshaw Hall.

- As a resident who travels to Manchester (as the main Centre of employment for the area) to work there are already serious issues with commuting from Rossendale. The infrastructure is poor with no railway connection, Burnley road and other local roads are in poor condition and any type of roadworks or accident on route from Loveclough to Rawtenstall immediately clogs up the whole area due to no reasonable alternative route.
- The Highway Capacity Study 2018 identified that the Rawtenstall Gyrotory could not accommodate the full 15 years of the Plan. The plan does **NOT** align growth with infrastructure and therefore it is reckless to just proceed with the Swinshaw Hall site without this being properly addressed and funded.

4. A Heritage Statement and Impact Assessment is provided and suitable mitigation measures are identified and secured to conserve, and where possible, enhance the setting of the nearby non-designated heritage asset known as Swinshaw Hall; and to also ensure the development makes a positive contribution to the Loveclough Fold Conservation Area:

The National Planning Policy Framework states that any plan should 'improve the environment'. This development is damaging to the area and its vast array of wildlife.

5. Archaeological investigation of the area south of Swinshaw Hall for a potential historic burial ground:^[11]_{SEP}

This investigation needs to be commissioned **independently** with results published and communicated to local residents. Please update the condition to include this.

6. Measures to deal with minerals identified at the site are submitted and agreed prior to development taking place on site:

Again, please update this condition to reflect that an **independent** assessment is needed.

7. An Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological Network and stepping stone habitat located within site:

Again, please update this condition to reflect that an **independent** assessment is needed. Development on the site would be destructive to an

abundance of local wildlife (birds, bats, badgers, newts etc.), trees and shrubs. It is an open amenity much loved and used by the local community.

8. A Landscape Assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site:

The Landscape and Visual Impact Appraisal (P73 in EL8.009.1) stated that the visual impact of the development was 'moderate-slight adverse' on residents of Hameldon Road. However, the photographs are biased to presenting a favourable view of the development having been taken from well within the estate on Hameldon Road and not from the viewpoint of Hameldon Road residents on the edge of the site where the impact is high (see photos taken from here below):



View of the proposed site from my property on Hameldon Road



View from the proposed site back onto bungalows on Hameldon Road

The privacy of existing residents needs to be duly respected with sympathetic landscaping and screening.

9. A Tree Impact Plan and Tree Constraints Plan are submitted with their findings secured and agreed prior to development taking place on site:

The condition on tree protection needs to be strictly enforced with any developer. Residents near 'The Woodside' development in Rawtenstall reported on local forums the destruction of protected trees at which point is too late to be stopped or reversed. Would the same reckless actions be allowed here? The developer should be obligated to substantially increase the number of trees on the site to improve the environment.

10. A Flood Risk Assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigation measures necessary:

This development would be concreting over areas already prone to flood. It would impact the natural springs and run offs from the hills. In severe weather Burnley Road already floods next to the proposed site. Water pours through the walls from the hills onto Goodshaw Lane, which in turn then travels through the site onto Burnley Road.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

The site specific policy condition should be updated to include a compulsory plan (with pre-agreed facilities/layout) for any developer to upgrade Loveclough Park with a comprehensive junior play area. Current provision is very poor and it is vital that facilities for local children are developed alongside any housing, i.e. aligning growth with infrastructure to benefit the area.

12. Details are submitted which clarify the relationship between the development and the adjacent retained Loveclough Park:

See point 11.

13. A Health Impact Assessment is submitted with its recommendations secured and agreed prior to development taking place on site:

Specifically for this site please update the condition to include **restrictions on the hours / days that development can take place on site** so that existing residents well-being is not impacted unreasonably by the noise from site.

Also the assessment should again be conducted **independently**.

Plans should be in place and publicly released as to how the Council will

ensure primary care services or dental services will be expanded sufficiently in the area to cater for the influx of residents from the land plan in its totality.

14.A contribution to the creation of car parking provision within the centre of Crawshawbooth:

A detailed plan should be in place and publicly available as to how extra car parking provision would be created and funded **prior to** approving this site.

15.A contribution towards increased school provision within the area (if identified as necessary):

Crawshawbooth Primary School is already operating at near capacity as is Alder Grange secondary school. Without appropriate expansion of these schools to accommodate the extra children from all the developments children living in Loveclough would have to be dispersed to other Schools in Rossendale. This would further exasperate traffic congestion, have a detrimental impact on road safety and the environment, prevent children from walking to School and indeed subject our youngest children to longer journeys to School. **Please remove '(if identified as necessary)' from this condition** as any developer should help fund the schooling needed to support their developments. This is in line with National Planning Policy Framework to **align growth with infrastructure**.

Yours sincerely,

Sally Dewhurst

\

Mark Booth

13/10/20

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair?
There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village

“Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue.

There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020.

This means that the report of impact on roads would be severely understated, as at this point the country was under a national

lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is "loose" to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*"The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**"*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of "free from development"?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambleton Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children's safety **IF** the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents.

The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is nowhere near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

C.Smithies

Christine Smithies

██████████
██████████
██████████

[Sent from Sky Yahoo Mail for iPad](#)

Mr Josh Sutton & Miss F Shaw



11TH October 2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036), my uncle and his family live in this area and I wholeheartedly disagree with this development.

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before

the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Josh Sutton and Fiona Shaw

FROM – ANNE MCKOWN, [REDACTED]
[REDACTED]

RESPONSE TO ROSSENDALE LOCAL PLAN – MAIN MODIFICATIONS
CONSULTATION

REFERENCE NUMBER -MM046

Policy EN7: Wind Turbines – pages 87-91 and paras 199 and 204

I wish to make the following brief comments re MM046

I note the removal of page 90, deletion of all of page 91 except for the second paragraph on that page, these changes were not initially apparent from reading the document

‘Schedule of Main Modifications September 2021 ‘but were so when this document was directly compared to ‘Local Plan Written Statement (regulation 19) August 2018.’

Could it be clarified why this is the case please?

I welcome the addition of the new closing paragraph on page 171.

Planning Policy
Rossendale Borough Council
Room 121, The Business Centre
Futures Park
Bacup
Lancashire
OL13 0BB

SENT BY EMAIL

forwardplanning@rossendalebc.gov.uk

14/10/2021

Dear Planning Policy Team,

ROSSENDALE LOCAL PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Rossendale Local Plan Main Modifications consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

MM06: Policy HS1

3. This policy is to be amended to extend the Plan period to 2036 and to increase the overall housing requirement to 3,191 dwellings. However, this is a reduction in the annual housing requirement from 212 dwellings per annum (dpa) to 208dpa for the period 2019/20 to 2020/21 and 185dpa for the period 2021/22 to 2035/36.
4. The HBF considers that it is appropriate to extend the plan period to 2036 to ensure that the strategic policies look ahead over a minimum 15-year period from the adoption of the plan.
5. The HBF does not consider that the proposed housing requirement is sound. The annual requirement of 208dpa followed by 185dpa is not considered to be sound. This is not considered to be consistent with national policy which looks to support the Government's objective of significantly boosting the supply of homes. The HBF is also concerned that this figure will not address the local affordable housing need and will not create an appropriate balance between economic development and housing.

MM013: Policy HS3

6. The Council propose to amend this policy to refer to sites of 0.5ha, the HBF considers that this amendment is appropriate and is line with national policy.
7. The Council also proposes to amend the policy to refer to the 10% affordable home ownership product. The HBF considers that the Council are right to make this change to



make sure that it is clear that the 10% refers to the overall housing number and not as a proportion of the affordable housing requirement.

MM014: Policy HS4

8. The Council are proposing to amend this policy to include reference to densities of at least 40 dwellings per hectare within town and districts centres. The HBF considers that the Council should amend this policy further to ensure that it is appropriately flexible.

MM015: Policy HS5

9. The Council proposes to amend this policy to apply to only developments of five or more dwellings. The HBF considers that this is an improvement on the previous policy.
10. The Council also proposes to include reference to Optional Standard M4(2) whilst the HBF still has some concerns in relation to the evidence to support this requirement and the viability of the requirement the HBF considers that the clarity of the policy has been improved.

MM025: Policy HS16

11. The Council proposes to amend this policy in relation to self-build and custom-built houses to state that the policy will be subject to the Council's self-build register and site viability. The HBF continues to consider that the Council's approach is restrictive rather than permissive by encouraging the inclusion of such housing on sites of 50 or more dwellings and does not consider that it is in line with Government objectives to boost housing supply. However, if the policy is to be retained the HBF considers that the inclusion of reference to the self-build register and the viability of the site are useful inclusions.

MM043: Policy ENV4

12. The Council are proposing to amend this policy to delete reference to 'with a net gain for biodiversity demonstrated' and this instead has been replaced to 'all development proposals should seek to protect and enhance biodiversity, and will be requested to quantify any net gains'. They are also proposing to delete the reference to the provision of SANGS. The HBF generally considers that these are improvements to the policy.

MM045: Policy ENV6

13. The Council proposes to amend this policy to delete the requirement for electric vehicle charging points on all new housing developments. This is to avoid duplication with Policy TR4. The HBF considers that this deletion is appropriate.

MM053: Policy TR4

14. The Council proposes to amend this policy to seek the incorporation of EV Charging Points, it looks for residential developments to include one charger per new house and one charger for every five apartments. The policy also states that exceptions will only be considered if it can demonstrated that they are not technically feasible or they are prohibitively expensive. The HBF continues to consider that this policy would benefit from further flexibility and should be clear that it will only apply on a per house basis where off-street parking is being for the dwelling. However, given Government's

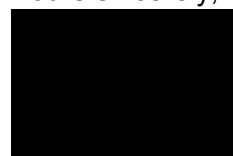
consultation on including EV Charging points as part of Building Regulations, it is possible that this policy will be superseded with a nationally defined standard.

Future Engagement

15. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

16. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



Joanne Harding
Planning Manager – Local Plan (North)



Mrs C Clement

14th October 2021

Dear Sirs

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours faithfully

Carol Clement

Miss Nancy Kelly



12th October 2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as "degraded" giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not "degraded" it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before

the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need"

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed "uneconomical" for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references "off-market" discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that "the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required". I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

3. **A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village. "Site accessed safely" is an issue with driver visibility being a significant problem. "The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road." The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the "local road were driven" and "site analysis" was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is "loose" to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other "High Susceptibility" properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children's safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

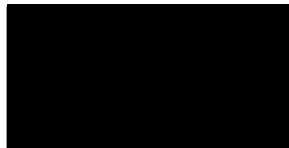
If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

N Kelly





Thursday, 14 October 2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as "degraded" giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not "degraded" it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need"

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed "uneconomical" for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references "off-market" discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that "the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required". I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village. "Site accessed safely" is an issue with driver visibility being a significant problem. "The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road." The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road.

3ii) The local road infrastructure

The pre-planning document commented that the "local road were driven" and "site analysis" was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is "loose" to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other "High Susceptibility" properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children's safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

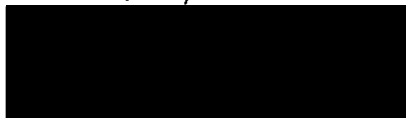
Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

A large black rectangular redaction box covering the signature of the sender.

Mason Woods

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036)

I am currently not able to sit down and compose a unique objection. But I have been fortunate to view the notes sent to yourselves from another Resident and Objector. I agree with this person's objections wholeheartedly. I have concerns about planning to build on green areas. I do not think the infrastructure of Limey Valley can sustain further development without hindering the current residents in numerous ways. I refer to the limited availability of Schools, GPS, Dentists and Police. Also, the access to all parts of the Limey Valley is served by Burnley Road, which is far too busy now, without the additional homes in this plan. Road Safety will suffer. As it is, there has been some serious accidents along Burnley Road. I actually had a very near miss whilst walking on the pavement, and I had to take evasive measures to avoid an industrial vehicle's wing mirror which was well into the pedestrian space. I moved here in 1997 onto a Brown Space site, but have seen several developments already in the valley. Enough is enough. Further development is unfair on the current residents. I believe and in my opinion, any quotas given by the Government have been fulfilled. I feel compelled to mention that Mr Boris Johnson made remarks during the Conservative Conference in Manchester earlier this year, that he would see an end to plans to build on Green Space. Let's start now. Let's plant more trees instead.

The other person I refer to, sent to you, objections which are very much in line with mine and my wife's who has authorised me to raise our objections jointly. This other person objecting was Ms Kaye Abbott who's full objection my wife and I concur with wholly, and of which I believe you already have her objection in full.

Philip & Gillian Amatt



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

October 14, 2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before

the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Dorothy M Graham



14/10/2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely



Thursday, 14 October 2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as "degraded" giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not "degraded" it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need"

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed "uneconomical" for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references "off-market" discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that "the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required". I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village. "Site accessed safely" is an issue with driver visibility being a significant problem. "The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road." The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road.

3ii) The local road infrastructure

The pre-planning document commented that the "local road were driven" and "site analysis" was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is "loose" to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other "High Susceptibility" properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children's safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

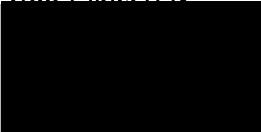
Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely



Kevin Woods

Dear Sir/Madam,

Natural England have no comments to make in relation to the Main Modifications Consultation.

Kind Regards

Janet Baguley
Lead Adviser – Greater Manchester & Merseyside;
Cheshire, Greater Manchester, Merseyside & Lancashire Area
Natural England
2nd floor, Arndale House, Manchester Arndale
Manchester, M4 3AQ

[REDACTED]

[REDACTED]

My working days are Monday – Thursday

www.gov.uk/natural-england

During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England’s regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.



[REDACTED]
Add address

Add
10/10/2021
Date

- Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Elizabeth Foy

Dear Forward Planning Team,

14/10/2021

We would like to comment on the Rossendale Local Plan (2019 – 2036) :-
Schedule of Proposed Main Modifications to the publication (Regulation 19) Draft
Plan.

Re: MM009 Housing Site Specific Policies - H35 Land off Todmorden Road, Bacup:-

Point no.5 and the Explanation at the end of the points should be more specific and mention the potential hazards of developing on land within a Development High Risk Area. Hazards include mine gas (methane), acid mine water and possible heavy metals contamination on parts of the site.

Mine gas (methane) is a critical issue and is noted in the Coal Authority letter relating to this site dated 29/6/2021. The Coal Authority suggests that the Local Authority should seek their own technical advice.

Does the Council employ officers with the relevant technical qualifications to enable the Council to make an informed decision on such technical issues occurring on this site?

At MM009 Housing Site Specific Policies – H35 Land off Todmorden Road, Bacup - we think that the wording at point no.5 (copied below) should include the following (additional words – shown underlined) :-

A coal mining risk assessment is submitted alongside intrusive site investigations which inform the Local Planning Authority of hazards such as mine gas (methane) and acid mine water and the potential remedial works and/or mitigation measures necessary and guide the layout of the development. After remediation, the land should comply with paragraph 183 – part (b) of the National Planning Policy Framework (NPPF);

We also think that mine gas (methane) and acid mine water should be included in the Explanation at the end of the points – we have copied the Explanation below and have underlined the words that we think should be added.

Explanation

The site has strong landscape character and development should include appropriate landscape measures to minimise adverse visual impact. The Local Highway Authority considers a single access point taken from Todmorden Road to be the preferred option if the site is to be delivered as a whole. The site is in an area of recorded and likely unrecorded mine workings at shallow depth and the Coal Authority have advised two mine entries may be present on site, one adjacent

to the site boundary with Todmorden Road and one adjacent to the site boundary with Old Todmorden Road.

Any acid mine water must be treated on-site and must not impact adjacent land or contaminate the rivers. It is vital that mine gases (methane) are dealt with, without increasing the amount vented into the atmosphere, where it becomes a powerful greenhouse gas.

These risks should also be considered by the LPA, and must take account of the requirements of Policy ENV6 : Environment Protection.

Parts of the site are at risk of surface water flooding. Part of the site is classified as a wildlife corridor serving the Lancashire Ecological Network for Wetland and Heath.

General concern:-

We are also concerned that intrusive site investigations, which will consist of drilling bore holes, excavating trenches and monitoring wells for mine gas (methane) and acid mine water, will create new pathways for them being released. If mine gas (methane) and acid mine water is released during investigations – our worry is, how it will be dealt with.

If mine gas (methane) is allowed to seep out into the atmosphere, increasing the greenhouse gas emissions, it will undermine the efforts made by many Rossendale residents trying to help the Council achieve the challenges in their report declaring a Climate Change Emergency.

As the Council declares in their report – they are committed to taking urgent action. Everyone has an impact on the environment, both locally and globally.

Regards,

John Atherton and Lynne Lomax



14/10/2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need"

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed "uneconomical" for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Peter Stansfield



Thursday, 14 October 2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as "degraded" giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not "degraded" it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need"

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed "uneconomical" for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references "off-market" discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that "the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required". I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village. "Site accessed safely" is an issue with driver visibility being a significant problem. "The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road." The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road.

3ii) The local road infrastructure

The pre-planning document commented that the "local road were driven" and "site analysis" was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is "loose" to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other "High Susceptibility" properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children's safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

A black rectangular box redacting the signature of Dylan Woods.

Dylan Woods

S Mckittrick

05/10/2021

Submit to forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available, or are these listed in a separate area? These should be published clearly in advance, with local residents able to object before a final decision is taken on the development. It feels like the development is being rushed through to tick boxes without the appropriate, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites. We should be protecting our natural countryside and using the brownfield for housing as, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley?

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

All the additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village
“Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road. I live on the main road (Burnley Road) and when we have weeks of bad weather in the winter cars are unable to access any of the housing estates and literally abandon their cars anywhere they can. What are the plans to mitigate this?

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”, Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children's safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

This is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Sharyn Mckittrick

Planware Ltd on behalf of McDonald's Restaurants Ltd**Objection Response to Rossendale Local Plan Main Modifications MM038****Policy R5 – Hot Food Takeaways**

1 Introduction

- 1.1 We have considered proposed Policy R5 – Hot Food Takeaways – with regard to the principles set out within the Framework. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date.
- 1.2 Within these broad points we have the following policy objections to draft Policy R5:
 - A. The 400m exclusion zone is inconsistent with national planning policy
 - B. The policy is inconsistent, discriminatory and disproportionate.
 - C. Examination of other plans have found similar policy approaches to be unsound.
 - D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.
- 1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy R5, which imposes opening hour restrictions on restaurants that include an element of hot food takeaway "*within 400-metres of a secondary school.*"
- 1.4 However, as stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling the obesity crisis. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform an any appropriate policy response. This has still not emerged.
- 1.5 Given the lack of any clear agreement between experts on the indices of obesity or poor health, analysing the evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text.

2 Contribution of McDonald's UK to the United Kingdom

- 2.1 This section of the objection sets out some background context relating to McDonald's own business, its contribution to United Kingdom, and information on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the adverse and unjustified impacts of the blanket ban approach proposed under draft Policy RT5.

Economic and Environmental Benefits

- 2.2 The first store in the United Kingdom was first opened in 1974 in Woolwich, London. The store is still opened and was interestingly the 3,000th store across the world.
- 2.3 With over 36,000 McDonald's worldwide, it operates in over 100 countries and territories. Approximately 120,000 people are employed by McDonald's UK, compared to just over 1 million employees worldwide.
- 2.4 McDonald's and its franchisees have become important members of communities in the United Kingdom: investing in skills and developing our people, supporting local causes and getting kids into football.
- 2.5 Nationally, the company operates from over 1,300 restaurants in the UK. Over 80% of restaurants are operated as local businesses by franchisees, that's around 1,100 franchised restaurants.
- 2.6 McDonald's is one of few global businesses that continues to anchor itself in high streets and town centres across the United Kingdom. Not just serving the general public but creating jobs and seeking to improve the communities around them.
- 2.7 All McDonald's restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald's packaging.
- 2.8 McDonald's is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved.
- 2.9 McDonald's restaurants are operated sustainably. For example, their non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All of their used cooking oil is converted into biodiesel for use by delivery lorries. Their entire fleet of lorries runs on biodiesel, 40% of which comes from McDonald's cooking oil. This creates over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel.
- 2.10 All new McDonald's restaurants in the United Kingdom are fully accessible and we are working toward delivering this same standard for all existing restaurants.
- 2.11 McDonald's restaurants provide a safe, warm and brightly lit space for people, especially those who may feel vulnerable or threatened waiting for a taxi or outside.
- 2.12 Many of their toilets are open to all members of the public. They are one of few night time premises that offer this service and given the fact restaurants are located in some of the busiest parts of the country, McDonald's are helping to keep the United Kingdom cleaner.

Nutritional Value of Food and Healthy Options

- 2.13 McDonald's offers a wide range of different food at its restaurants.
- 2.14 Nutritional information is easy to access and made available online, and at the point of sale on advertising boards, as well as in tray inserts. Information is given on calorie content and key nutritional aspects such as salt, fat and sugar content. This enables an individual is able to

identify and purchase food items and combinations that fit in with their individualised calorie or nutritional requirements.

- 2.15 The menu offer includes a range of lower calorie options, some of which are set out in the on the next page.
- 2.16 The restaurants now suggest meal bundles to assist customers in making informed, healthier choices. McDonald's have suggested "favourites" meal bundles, across the breakfast and main menu that enable the choice of low-calorie options to be made even more easily. These 3-piece meal combinations will all be under 400kcal on the breakfast menu, and all under 600kcal on the main menu (with many options under 400kcal on the main menu also), and all individual items on these menu bundles will be either green (low) or amber (medium) on the Food Standards Agency traffic light system for food labelling.
- 2.17 Examples of low calorie (less than 400kcal) breakfast options (where no single item is red for FSA) include any combination of the following:
- Egg & Cheese McMuffin / Egg & cheese snack wrap / bagel with Philadelphia / porridge; with fruit bag; and a medium black coffee, or espresso or regular tea or water.
- 2.18 Examples of low calorie (less than 600kcal) main menu options (where no single item is red for FSA) are included in the table below. Some 90% of our standard menu is under 500 calories.

Main	Side Options	Drinks Options	Total Calories *varies depending on side & drink choice
The Garlic Mayo Chicken One – grilled wrap	Fruit Bag – Pineapple Stick Carrot Sticks Side Salad with Fajita Dressing	Diet Drink Water Medium Black Coffee Regular Tea	Between 379-390kcal
The Sweet Chilli Chicken One – grilled wrap	Fruit Bag – Pineapple Stick Carrot Sticks Side Salad with Fajita Dressing	Diet Drink Water Regular Tea Medium Black Coffee	Between 374-383kcal
Grilled Chicken & Bacon Salad with Fajita Dressing	Fruit Bag – Pineapple Stick Carrot Sticks	Diet Drink Water Regular Tea Medium Black Coffee	Between 238-247kcal

- 2.19 Those specifically wanting a meal low in either fat, salt, or sugar, can tailor their choices accordingly. Any combination of menu items sold at McDonald's can be eaten as part of a calorie controlled nutritionally balanced diet. Customers alternatively eat anything from the menu allowing for this within their overall daily, or weekly nutritional requirements.

Quality of Ingredients and Cooking Methods

- 2.20 McDonald's are always transparent about both their ingredients and their processes and strive to achieve quality. Their chicken nuggets are made from 100% chicken breast meat, burgers are made from whole cuts of British and Irish beef. Coffee is fair trade and their milk is organic. McDonald's want their customers to be assured about what they are consuming. The 'Good to Know' section on our website - <https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html> - provides a range of information about their processes and where produce is sourced from.

Menu Improvement and Reformulation

- 2.21 McDonald's is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald's UK, has provided a letter giving examples of the steps that have been taken in recent years. The information is summarised below.
- 2.22 In recent years McDonald's has made great efforts to reduce fat, salt and sugar content across their menu.
- 89% of their core food and drink menu now contains less than 500 kcals.
 - Supersize options were removed from their menu in 2004;
 - 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model;
 - Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z);
 - Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk;
 - Customers can swap fries for fruit bags, carrot sticks or shake salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost;
 - In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal.

Fat

- 2.23 A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014).
- 2.24 However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much of it will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities.
- 2.25 What have McDonald's done?
- Reduced the saturated fat content of the cooking oil by 83%;
 - Signed up to the Trans Fats pledge as part of the Government's "Responsibility Deal";
 - The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible;
 - They have completely removed hydrogenated fats from the vegetable oils;
 - Reduced the total fat in the milkshakes by 32% per serving since 2010;
 - Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants.

Sugar

- 2.26 Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcal/g.
- 2.27 The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of "free sugars" (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations.
- 2.28 Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity.
- 2.29 Over the last 10 years our reformulation work has resulted in 787 tonnes less sugar across our menu in 2017 versus 2007. What have McDonald's done?
- Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar
 - Their Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed
 - Their Festive Dip has removed 4 tonnes of sugar
 - Their famous McChicken Sandwich Sauce has reduced in sugar 45%
 - Their Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system
 - Their Chucky Salsa has reduced in sugar by 28%
 - Since 2016 they have reduced the sugar content of Fanta by 54%
 - The Toffee Syrup in their Toffee Latte has been reformulated to remove 20% of the sugar
 - McDonald's have also reformulated their Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink

Salt

- 2.30 A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website).
- 2.31 Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this.
- 2.32 Salt does not directly lead to obesity; however, it does lead to increased thirst, and not everyone drinks water or calorie-free "diet" beverages. If our thirst increases and leads to increased consumption of calories from extra fluid intake, then this may lead to increased weight and obesity. 31% of fluid drunk by 4-18-year-old children is sugary soft drinks (He FJ et al, 2008), which has been shown to be related to childhood obesity (Ludwig DS et al, 2001).

2.33 What have McDonald's done?

- The salt content across the UK menu has been reduced by nearly 35% since 2005;
- Customers can ask for their fries to be unsalted;
- The salt added to a medium portion of fries has been reduced by 17% since 2003;
- The average Happy Meal now contains 19% less salt than in 2006
- Chicken McNuggets contain 52% less salt than in 2003.

2.34 The process continues. McDonald's have recently made the following changes to further improve their menu

- Making water the default drink in the Happy Meals;
- Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available.

Third Party Opinions of McDonald's

2.35 McDonald's regularly receive supportive comments from independent third parties.

2.36 Professor Chris Elliott, of the Department for Environment, Food & Rural Affairs' independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013:

"Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald's and Morrisons."

2.37 Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food & Drink Book Awards to the Press Association:

"Everyone always liked to poke at McDonald's. McDonald's has been doing more than most mid and small-sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don't work for them. I'm just saying they've been doing it - 100% organic milk, free range eggs, looking at their British and Irish beef."

2.38 Raymond Blanc, the TV chef and food writer, speaking in 2014, after having presented McDonald's UK with the Sustainable Restaurant Association's Sustainability Hero award:

"I was amazed. All their eggs are free-range; all their pork is free-range; all their beef is free-range."

"[They show that] the fast-food business could change for the better. They're supporting thousands of British farms and saving energy and waste by doing so."

"I was as excited as if you had told me there were 20 new three-star Michelin restaurants in London or Manchester."

2.39 Marco Pierre White, TV chef and food writer, speaking in 2007:

"McDonald's offers better food than most restaurants and the general criticism of the company is very unfair."

"Their eggs are free range and the beef is from Ireland, but you never hear about that. You have to look at whether restaurants offer value for money, and they offer excellent value."

These comments below represent independent opinions

Supporting Active and Healthy Lifestyles among Employees and Local Communities

2.40 McDonald's is focused on its people and is proud to have been recognised for being a great employer. For example:

Great Place to Work 2017 'Best Workplaces' – McDonald's are ranked 4th on the Great Place to Work 2017 'Best Workplaces' list (large organisation). This is our 11th year on the list.

- The Sunday Times Best Company to Work for List 2017 - we have made The Sunday Times 30 Best Big Companies to Work for list for the seventh consecutive year, achieving 6th position.
- Workingmums.co.uk Employer Awards 2017- Innovation in Flexible Working - in November 2017, we were awarded the Top Employer for Innovation in Flexible Working by workingmums.co.uk. The judges specifically recognised our approach to Guaranteed Hours contracts.
- The Times Top 100 Graduate Employers - the Times Top 100 Graduate Employers is the definitive annual guide to Britain's most sought after employers of graduates.
- Investors in People Gold - Investors in People accreditation means we join a community of over 15,000 organisations across 75 countries worldwide and it is recognised as the sign of a great employer.
- School leavers Top 100 Employees - McDonald's UK has been certified as one of Britain's most popular employers for school leavers in 2017, for the third consecutive year. An award voted for by 15-18 year olds in the UK.

2.41 In April 2017, McDonald's began to offer employees the choice between flexible or fixed contracts with minimum guaranteed hours. This followed trials in 23 restaurants across the country in a combination of company owned and franchised restaurants. All of their employees have been offered this choice and around 80% have selected to stay on flexible contracts.

2.42 Over the past 15 years, McDonald's has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association.

2.43 This partnership has seen them support over one million players and volunteers. In London since 2014, more than 1,000 people have attended their Community Football Days and have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald's restaurants within the M25, approximately 88 are twinned and actively supporting a local football club. This serves as an example of the company's willingness to confront the obesity crisis by a multitude of different approaches.

2.44 McDonald's do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.

- 2.45 Their Community Football programme helps to increase participation at all levels. McDonald's remain absolutely committed to it and are in the final stages of planning a new programme for future years.

Marketing

- 2.46 As a business, McDonald's are committed to ensuring their marketing will continue to be responsible and will be used as a positive influence to help our customers make more informed choices.
- 2.47 McDonald's recognise that marketing has a part to play in influencing customers' choices. They comply, and go beyond, the UK's stringent regulations on marketing to children and use their marketing to help families understand more about the range of food options they have to offer.
- 2.48 McDonald's never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. They are committed to ensuring that marketing is always responsible as well as informative, and that it reinforces positive food messages.
- 2.49 In addition, they go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, they only ever do so with items such as carrot sticks, a fruit bag, milk or water to ensure McDonald's are not marketing HFSS food to children. This has been done voluntarily since 2007.

Summary

- 2.50 In the light of the above it is clear that McDonald's restaurants offer the district considerable and substantial economic benefits, are supportive of active and healthy lifestyles. They also enable customers to make informed, healthy decisions from the wide-ranging menu options available. It is important that this is acknowledged, given the assumption in proposed Policy R5, that all hot food takeaways uses should fall under opening hour restrictions if within 400m of a secondary school. Given the policy aim – which McDonald's supports – of promoting healthier lifestyles and tackling obesity, other alternatives would be more effective than allowing blanket bans in school areas, which in turn will have negative land use consequences.
- 2.51 We turn now to the main points of the objection.

3 The 400m Exclusion Zone is Inconsistent with National Policy

Introduction

- 3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is also discussed in the next section.
- 3.2 National policy contains no support for a policy approach containing an exclusion zone or opening hour restrictions for hot food takeaways (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development.
- 3.3 Planware Ltd feel that restricting hot food takeaway opening hours within 400m of a secondary school is in direct conflict with the framework as the approach is not positive, justified, effective or consistent. The policy, as currently worded, provides no flexibility to uses which incorporate restaurants which are required to be open at lunchtimes and in the evening. These points are further explained in this objection.

Practical Impacts

- 3.4 The practical impacts of a 400m exclusion zone around secondary schools would have unacceptable negative land use consequences. It would provide unfair trading with competitors who were located outside of the 400m distance.
- 3.5 Consideration should be given to school rules in terms of allowing children outside of the school grounds at lunch times. This is overly restrictive on secondary schools, where a some of pupils will be legally classed as an adult. Additionally, some sixth form pupils will have access to a car, making such a restriction unsound. In addition, most schools do not allow pupils outside of school at lunchtimes.
- 3.6 No consideration is given to how the 400m is measured. Guidance should be provided as to whether this is a straight line or walking distance, as this can vary greatly.
- 3.7 The Framework does not support the use of planning as a tool to limit people's dietary choices. In addition to this, other E class uses can provide unhealthy products, therefore, there is limited justification for the proposed Policy R5 to focus exclusively upon hot food takeaways, when pupils could simply go to a Class E use and buy an alternative product.

Conflict with National Policy

- 3.8 The local policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against hot food takeaways uses leaving limited reasonable space for them to locate without accepting unacceptable opening hour restrictions.
- 3.9 Restricting the location of new hot food takeaway proposals through a 400m exclusion zone around secondary schools is not a positive approach to planning, thus failing to comply with the Framework.
- 3.10 The suggested restriction within proposed Policy R5, takes an ambiguous view of hot food takeaways in relation to the proximity to all secondary schools. The policy would apply an over-generic approach to restrict hot food takeaway development with little sound planning reasoning

or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area.

3.11 Thus, is consistent with paragraph 81-82 of the Framework.

3.12 Para 81 states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”

3.13 Para 82 states:

Planning policies should:

“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

3.14 As explained in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 31 of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidence and the lack of evidence should highlight a red flag concerning the draft policy.

3.15 The policy is likely to be damaging to the district's economy due to the fact that it is restricting hot food takeaways to an unprecedented level without regard to the local area or the economy.

3.16 The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket ban approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on “Health and Wellbeing”:

3.17 Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that:

“opportunities for healthy lifestyles have been considered (eg. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);”

- 3.18 Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be considered, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states:

“Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.”

- 3.19 The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include a Sui Generis use as being identical.

4 The Policy is Inconsistent, Discriminatory and Disproportionate

- 4.1 The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of Sui Generis use. Yet Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from a restaurant unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an Sui Generis use. It also means that the policy has a disproportionate effect on operations with an Sui Generis use.
- 4.2 The test of soundness requires that the policy approach is “justified”, which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework).
- 4.3 Given the objectives of the policy, it ought to apply equally to all relevant food retailers. It is unclear how the policy would be implemented and work in a real life scenario.
- 4.4 The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald's. The evidence provided at **Appendix 1** confirms that 70% of purchases by students in the school fringe were not purchased in a hot food takeaway.¹

Company	Snack or meal	Salt (g)	Fat (g)	Calories (kcal)	Price (£)
McDonald's	Apple and Grape fruit bag	0.0	0.1	46	49p
McDonald's	Garlic Mayo chicken wrap	1.3	11.0	345	2.99
Greggs	Sausage roll	1.6	22.0	317	90p
Greggs	Cheese and Onion bake	1.6	30.0	436	1.35
Costa Coffee	Nutty flapjack	0.1	23.2	425	1.70
Costa Coffee	Ham and Cheese panini	2.5	13.5	427	3.95

- 4.5 If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to hot food takeaways. In fact, by restricting hot food takeaway uses only, the policy would encourage food purchases at other locations and allows for the overarching objectives to be compromised.
- 4.6 Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that “At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school.”²

¹ The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University.

² Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, Childhood Obesity in the UK: Is Fast Food a Factor? http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt

- 4.7 For the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal.
- 4.8 The policy's blanket approach fails to acknowledge that the opportunity for children to access hot food takeaways, as part of a school day, is extremely limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might become a more prominent matter. Only limited purchases of food are made at hot food takeaways on journeys to and from school. Further details are set out in **Appendix 2**.

5 The Policy is not Justified because of a Lack of an Evidence Base

- 5.1 The test of soundness requires policy to be evidence based. There is no evidence of any causal link between the presence of hot food takeaways within 400m of a secondary school. Also, with no basis to indicate over-concentrated areas gives rise to obesity or poor health outcomes, justification is evidently incomplete. In fact, the studies that have considered whether such a causal connection exists [between proximity of a hot food takeaway and poor health outcomes], have found none.
- 5.2 Public Health England (PHE), which is part of the Department of Health and Social Care, expressly accept that the argument for the value of restricting the growth in fast food outlets is only “theoretical” based on the “unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes.”³
- 5.3 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation ‘did not find strong evidence at this time to justify policies related to regulating the food environments around schools.’ It instead highlighted the need to ‘develop a higher quality evidence base’.⁴
- 5.4 The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper “Weighing the Evidence of Common Beliefs in Obesity Research” (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report).
- 5.5 There appears to have been no critical assessment of whether the underlying evidence supports the proposed policy approach.
- 5.6 In this context, it is important to consider the evidence from the Borough of Waltham Forest, which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the borough shows that there has been no discernible impact on childhood obesity rates – with these worsening in recent years. The borough’s Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games.
- 5.7 While it is accepted that the causes of obesity are complex, it is clear that the school exclusion zone policy had no discernible effect in Waltham Forest. More research and investigation is needed before such a policy approach can be justified by evidence.

³ Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013

⁴ J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

6 Similar Policies Have Been Found Unsound When Promoted in Other Plans

- 6.1 The lack of evidence between proximity of takeaways to local schools and its impact on obesity has been confirmed in a number of planning decisions.
- 6.2 In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating 'the evidence base does not adequately justify the need for such a policy', and due to the lack of information, it is impossible to 'assess their likely impact on the town, district or local centres'.⁵
- 6.3 Similarly, research by Brighton & Hove concluded that 'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'.⁶
- 6.4 The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on hot food takeaways, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options existed) confirmed that the councils own 'healthy' plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and "confounds its own efforts to improve healthiness of the food provided by takeaway outlets" and failed to "address the demand for the provision of convenience food". The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound.
- 6.5 The inspector at Nottingham City Council stated "*There is insufficient evidence to support the link between childhood obesity and the concentration or siting of A3, A4 and A5 uses within 400m of a secondary school to justify the criterion of policy LS1 that proposals for A3, A4 and A5 uses will not be supported outside established centres if they are located within 400m of a secondary school unless it can be clearly demonstrated that the proposal will not have a negative impact on health and well-being the criterion and justification should therefore be deleted/amended*".
- 6.6 The inspector at Rotherham stated "*Policy SP25 sets out various criteria against which proposals for hot food takeaways will be assessed. One of the criteria is designed to prevent hot food takeaways within 800 metres of a primary school, secondary school or college when the proposed site is outside a defined town, district or local centres. Having carefully considered the material before me and the discussion at the Hearing I do not consider there is sufficient local evidence to demonstrate a causal link between the proximity of hot food takeaways to schools and colleges and levels of childhood obesity. Although I accept that levels of childhood obesity need to be tackled by both local and national initiatives I do not consider there are sufficient grounds at the present time to include this particular aspect of land use policy in the RSPP*".
- 6.7 In Guildford, the inspector stated "*Finally, the submitted Plan contains a requirement common to Policy E7 Guildford town centre, E8 District Centres and E9 Local Centres and isolated retail units that resists proposals for new hot food takeaways within 500 metres of schools. However, the evidence indicates that childhood obesity in Guildford is lower than the average for England. Childhood obesity may be a product of a number of factors, not necessarily attributable to*

⁵ Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate.

⁶ Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 30, September 2011

takeaway food; takeaways often sell salads as well as nutritious foods; not all kinds of takeaway food are bought by children; children have traditionally resorted to shops selling sweets and fizzy drinks, which would be untouched by the policy; and the policy would have no bearing on the many existing takeaways. In this context there is no evidence that the requirement would be effective in safeguarding or improving childhood health. It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound".

7 Alternative Approaches

- 7.1 Planware Ltd considers there is no sound justification for point C of the proposed Policy R5 which imposes commercial restrictions on restaurants that include an element of hot food takeaways within a 400m of a secondary school. Points C should therefore be removed to provide consistency and to abide by the Framework. Point D should provide an evidence base as to why this relates only to Reception or Year 6 pupils, particularly given that neither would attend a hot food takeaway unaccompanied by an adult. No detail is given as to how regularly the obesity figures will be reviewed.
- 7.2 Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.
- 7.3 It is considered until such a time has been reached, point C should be removed.

8 Conclusion

- 8.1 McDonald's supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed Policy R5 is a sound way of achieving those objectives. The underlying assumption in the policy is that all hot food takeaways (and any restaurants with an element of takeaway use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald's own business is an example of a restaurant operation which includes takeaway but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve.
- 8.2 In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald's own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health.
- 8.3 The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with Class E consents and can be delivered from the latter. **The policy makes no attempt to control these uses.**
- 8.4 For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses. There is no justification in national policy for such restrictions to be applied to hot food takeaways. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald's from major commercial and tourist areas.
- 8.5 For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction.
- 8.6 Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding hot food takeaway development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against hot food takeaways alone is worrying and using the planning system to influence people's daily lifestyle choices is not acceptable.

Appendix 1 – Food in the School Fringe Tends to be Purchased in Non-Hot Food Takeaway Properties

1. Research by Professor Jack Winkler (London Metropolitan University) into the 'school fringe' – found just 3/10 purchases by students in a 400m school fringe were made in A5 properties.⁷
2. 70% of purchases in the school fringe were made in non-fast food outlets, and the same research concluded 'the most popular shop near Urban was the supermarket, with more visits than all takeaways put together'.
3. Professor Winkler's findings are not an isolated case. A report by Public Health England and the LGA states that fast food school proximity restrictions do 'not address sweets and other high-calorie food that children can buy in shops near schools.'⁸
4. Research by Brighton and Hove found that 'Newsagents were the most popular premises [in the school fringe], with more pupils visiting newsagents than any A5 premises'.⁹
5. Likewise, research for the Food Standards Agency on purchasing habits in Scotland found that 'Supermarkets were the place that children reported they most frequently bought food or drinks from at lunchtime'.¹⁰
6. Indeed, there are several more researchers who have found no evidence to support the hypothesis that less exposure to fast food, or better access to supermarkets are related to higher diet quality or lower BMI in children. ¹¹¹²¹³

⁷ The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University

⁸ Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013

⁹ Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 28, September 2011

¹⁰ Jennie Macdiarmid et al. Food Standards Agency. Survey of Diet Among Children in Scotland (2010) - http://www.esds.ac.uk/doc/7200/mrdoc/pdf/7200_final_report_part_2.pdf

¹¹ Forsyth, A., et al., Do adolescents who live or go to school near fast-food restaurants eat more frequently from fast-food restaurants? Health and Place,, 2012. 18(6): p. 1261-9.

¹² An, R. and R. Sturm, School and residential neighborhood food environment and diet among California youth. American Journal of Preventative Medicine, 2012. 42(2): p. 129-35.

¹³ Timperio, A.F., et al., Children's takeaway and fast-food intakes: associations with the neighbourhood food environment. Public Health Nutrition,, 2009. 12(10): p. 1960-4.

Appendix 2 – Food Purchases made on School Journeys

Only a limited number of journeys to and from school involve a purchase at a food outlet.

1. This has been confirmed in research by the Children's Food Trust, which found that only 8% of all journeys to and from school included a purchasing visit to a food outlet.¹⁴

	n	Number of journeys to school	Number of journeys from school	Total number of journeys	Percentage (%) of all journeys
Journeys including a visit to a food outlet		86	87	173	10
Journeys including a purchase from a food outlet		11	6	17	8

2. Of the food purchases made on school journeys, confectionary was the most popular item sold – which McDonald's does not offer on its menu.

3. Likewise, research by Ashelsha Datar concluded that children 'may not purchase significant amounts of junk food in school' – partly due to 'fewer discretionary resources to purchase them'.¹⁵

4. Indeed, even where purchases were made, 'children may not change their overall consumption of junk food because junk food purchased in school simply substitutes for junk food brought from home.'

5. Similarly, research by Fleischhacker highlighted the need for future school-based studies to 'gather information on whether or not the students attending the studied schools actually eat at the restaurants near their schools.'¹⁶

6. This was also highlighted in the systematic review by Oxford University, which states 'future work should also incorporate a child's usual mode of travel to and from school into decisions about appropriate buffer distances.' The review added that age should also be taken into consideration, as this can impact on travel time and the availability of pocket change.¹⁷

¹⁴ Children's Food Trust – November 2011, page 1 http://www.childrensfoodtrust.org.uk/assets/research-reports/journey_to_school_final_findings.pdf

¹⁵ Ashelsha Datar & Nancy Nicosia, Junk Food in Schools and Childhood Obesity, page 12, May 2013

¹⁶ S Fleischhacker et al. A systematic review of fast food access studies, page 9, 17th December 2009

¹⁷ J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13-14, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.



14 October 2021

Forward Planning Team
Rossendale Borough Council
The Business Centre
Futures Park
Newchurch Road
Bacup
OL13 0BB

Dear Sir/Madam

**Rossendale Local Plan – Main Modifications Consultation
Schedule of Proposed Main Modifications to the Local Plan (EL12.002)
Housing Allocation Ref. H64 – Grane Village, Helmshore (pages 74/75)**

Under the heading “Development of up to 139 dwellings will be supported provided that” (page 74) a number of assessments and investigations are recommended. Grane Residents’ Association has submitted numerous documents on the none-suitability of the proposed development site, and we do not propose to repeat these views in our response to the consultation. However, as there are hundreds of written objections to the proposed development i.e. planning application number 2019/0335, and a petition containing 2,439 signatures of objection, we believe any such assessment or investigation should be independently verified, prior to the site receiving planning approval.

The Explanation (page 75) states that a Lives and Landscape Assessment in 2017 recommended suitable mitigation measures for future development. One must question what mitigation would be possible to suitably compensate for the loss of fauna and flora, especially taking into account that the assessment quoted is four years out of date and the site has been further wilding during this time. We are concerned that a change to the Urban Boundary to enable housing development will not only destroy the biodiversity of the site, but also remove a site that is currently acting as a carbon sponge and soak away, preventing flooding in Helmshore and beyond and is assisting Rossendale Borough Council in its Strategy to combat climate change.

Yours faithfully
Michael Murray MBE
Chairman

Dear planning I would like to object to the above planning application.

Objecting on the grounds of ecological damage and possible flooding, the proposed entry and exit is in a dangerous place, no consideration at all has been given towards the houses being built opposite it.

Massive lack of infrastructure in surrounding area, No Doctors, No Dentist, Very limited parking in Crawshawbooth, the nearest village where the shops are located. No Primary school places at Crawshawbooth Primary School are available. Can't see any planning for extra classrooms on Crawshawbooth Primary School being done. The developer of the opposite estate has it in their planning that they MAY have to provide funding for the school, which I very much doubt will happen, and seen as the main catchment area is to the North of the school, meaning anything above it towards loveclough, a lot more children will be needing places.

There are no facilities for children whatsoever in the surrounding are your park behind the school is an absolute disgrace and insult, the park in Loveclough is no better.

A massive increase in road traffic it is already a very busy road and you can't use the data that was produced during lockdown by placing the strips on the road to monitor traffic, as traffic was much much lighter then. LCC provide a very poor gritting service now, so everyone on the surrounding estates in winter have to park on Burnley Road causing added danger.

Rawtenstall has difficulty with the current volume of traffic as it is now. The volume of traffic travelling through Crawshawbooth will be at a substantially greater level than it is now causing many more problems and a higher level of danger to all road users and pedestrians.

I doubt very much this objection will have any influence on anyone at the council as you never listen to any of your constituents and seem to be very greedy wanting maintenance contracts put on new builds but still take 100% percent of the council tax.

Regards

Kevin Bent

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

Mr Jason Norris
[REDACTED]
[REDACTED]
[REDACTED]

14th October 2021

Dear Sir or Madam,

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next to the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increased school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely,

Jason Norris

Miss Kaye Abbott
[REDACTED]
[REDACTED]
[REDACTED]

14th October 2021

Dear Sir or Madam,

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increased school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

I would like my objection made to the pre-planning application and the evidence I supplied considered in addition to this letter.

Yours sincerely,

Kaye Abbott

Mr and Mrs Turner (two objections)

14/10/21

NB This should count as two objections

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair?

There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

NB This should count as two objections

Yours sincerely

Mr and Mrs Turner **NB This should count as two objections**

Mr and Mrs Turner (two objections)

14/10/21

NB This should count as two objections

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair?

There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village “Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny. Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

NB This should count as two objections

Yours sincerely

Mr and Mrs Turner **NB This should count as two objections**

Forward Planning
Rossendale Borough Council
Business Directorate
Development Control
Futures Park
Bacup
Lancashire
OL13 0BB

14 October 2021

Dear Sir/Madam

Representation To Schedule Of Main Modifications - Rossendale Local Plan (2021-2036)

Representation on Behalf of Westchurch Homes
Kennedy House, 31 Stamford St, Altrincham, Cheshire, WA14 1ES
C/O Maybern Planning and Development

On behalf of Westchurch Homes, we hereby submit representations to the “*Schedule of Main Modifications*” to the Rossendale Local Plan (2019-2036) that is on consultation by Rossendale Borough Council (RBC) until 15 October 2021.

Schedule of Main Modifications

MM01 – Spatial Portrait

From review of the consultation report, **MM01**, proposes amendments to the Settlement Hierarchy at Table 1.

It is proposed to amend the designation of certain settlements/ areas; this includes amending Facit from an urban local service centre to a rural local service centre.

This amendment is objected to and Facit should be restored as an urban local service centre.

This objection is made on the following basis, having regard to the text/provisions of the Development Hierarchy and the Settlement Hierarchy Table 1 list of services and facilities as referenced to settlement levels.

Initially, it is relevant that additional text is proposed to be included in the Policy description of the Borough comprising:

“Rossendale is defined by a series of inter-locking valleys, which dissect open moorland, and closely linked small towns line the valley floors. This creates a main urban core from Haslingden through to Whitworth”.

Given this description, it must follow that the settlement area of Facit which immediately adjoins and connects to Whitworth is part of the urban core of the Borough, and thus an urban area. There is no break in development form or intervening non-urban land (countryside) separating Facit and Whitworth.

The definition of Urban Local Service Centres in the Plan policy text states that they are *close* to the Key Service Centre towns and *are urban in character*, as distinguished from Rural Local Service Centres that are in more rural locations.

Urban Local Service Centres are also stated to benefit from good transport connections to services in the nearby towns as well as having a range of facilities.

Rural Local Service Centres are however considered to be *discrete settlements with links to Key Service Centres* that serve their own residents and those in nearby villages with basic services, and are able to provide for future *local* housing and employment needs.

(italics/underline are via Maybern emphasis).

From a review of Facit as a settlement area, it is clearly evident that the settlement is urban and is an extension of /close to the key service centre of Whitworth; it is not a rural settlement separated from the urban area by countryside.

It also has good transport connections, being on the high frequency bus route (as Whitworth), and has a range of facilities, including facilities that overlap with Whitworth, and which in cases are closer to Facit than parts of Whitworth. As such, it is considered that Facit is an integral extension of Whitworth.

In respect of the Settlement Hierarchy Table 1 and list of services, it is considered that Facit accords with the majority of the listed facilities for urban local service centres in respect of having more than one shop including a convenience store (baker/ butchers which also sells other goods); is on the high frequency bus corridor; has a primary school (St Our Lady & St Anselm's RC Primary School); has community facilities (e.g. St John The Evangelist Church) and, given the location of Whitworth Leisure Centre and adjacent recreation facilities, is served by that provision (those facilities being generally the same distance to all areas of Facit as to southern parts of the settlement of Whitworth). In this respect, it is also considered that health facilities with a Whitworth address are also accessible to and similar distance to Facit (as to parts of Whitworth).

It is therefore contended that Facit should remain as an urban local service centre in the settlement hierarchy and Table 1.

MM27- Employment Sites Allocations – Table 8

Objection is made to Table 8 in Policy EMP2 on the basis of:

- the proposed amendment to define sites as 'allocations' rather than 'existing employment sites'; and
- to refer to potential spare capacity areas on sites as allocations; and in respect of site EE47, the 0.34ha gross area of capacity identified on the site to potentially accommodate additional employment development.

The objection to site EE47 area capacity and potential for additional employment development to be achieved on the site is based on its location and access arrangement.

The site's location adjacent to the River Spodden results in an easement requirement, which may alter depending upon the type of development proposed. As such, additional/ alternative employment development may be limited by the easement requirement and this would need to be fully considered.

A requirement for a cycle route connection (as a section of Valley of the Stoneway route) is currently being indicated via the site which may be incompatible with an employment use/change on the site and would certainly restrict any development capacity.

Additionally, its location adjacent residential development would influence whether additional employment uses/development could be applied to the site on amenity grounds.

The site access width and position off a predominantly residential street would also likely limit the number and frequency of traffic movements (HGV/car) that are possible and would likely have a bearing on the type and scale of employment development that would be capable of being accommodated on the site for additional employment development.

As such, it is questionable whether additional employment development could be accommodated on the site in technical and practical terms.

The amendment to the wording of Table 8 to identify the site (and other existing employment sites) as an 'allocation' rather than just being identified as an 'existing employment site' is therefore also objected to.

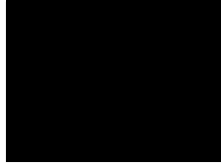
In this respect, it is not usual for existing employment sites, which are to be considered against policy EMP3, to be listed in an employment supply allocations list.

Please do not hesitate to contact me should there be any queries on this representation and we await confirmation of its receipt and registration.

Yours Faithfully,

A solid black rectangular box used to redact the signature of Sarah Jones.

Sarah Jones
Associate Planning Consultant
For and behalf of Maybern Planning and Development



Thursday, 14 October 2021

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as "degraded" giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not "degraded" it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need"

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed "uneconomical" for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair? There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references "off-market" discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that "the valley had plenty of 3 and 4 bedroom houses and this building stock wasn't required". I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men's club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village. "Site accessed safely" is an issue with driver visibility being a significant problem. "The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road." The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road.

3ii) The local road infrastructure

The pre-planning document commented that the "local road were driven" and "site analysis" was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn't a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is "loose" to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties

on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other "High Susceptibility" properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children's safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents. The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

A black rectangular box redacting the signature of Morgan Woods.

Morgan Woods

Dear Forward Planning Team

With [ref.to](#) THE BELOW -

Following the commencement of the consultation on the proposed Main Modifications to the Local Plan on the 3rd September 2021 the Council have now uploaded Errata documents to both the [Schedule of Proposed Main Modifications to the Local Plan](#) and the [Schedule of Proposed Policy Map Modifications](#). These documents propose and explain a small number of changes to the Written Statement and the Policies Map, relating to Haslingden Conservation Area, and four housing allocations. These are both saved in [Examination Library 12](#).

-nothing of value has been proposed and my previous letter (below) is even more pertinent than before in view of the accelerating climate crisis. Rossendale BC has continually blamed the present government for their intended use of green belt land but this cannot now be the case as The Prime Minister has promised NOT to build on green fields.

**"At the Tory Conference yesterday the Prime Minister advocated building quality houses on brown belt land
He pledged to protect our green spaces!!!!!!"**

I hope that Rossendale BC will take this on board Nature, conservation and preservation of green spaces leading to strong ecosystems is imperative if we are to save the life of this planet. Please waken up Rossendale BC and do the right thing for the survival of mankind

Also see below-

THE DAILY TELEGRAPH

PM pledges no homes on green fields

Of such importance is our fight to save the planet that the Royal Family have now joined in the debate illuminating the massive concern nationally and globally

A private professional assessment has been carried out in Rossendale which categorically proves that we have enough brown field sites to meet our house building requirements. Excuses not to use his land at a time of critical importance when every green field matters are unforgivable.

In respect of application 2019/0335 you will by now hopefully be aware that an adjacent brown field site has become available which could accommodate most of the planned homes for this area. This would not bring about the devastation for which there is no mitigation that the proposed above plans in application 2019/0335 would

I trust that these matters are will be given thorough scrutiny and attention as jeopardising our planet is NOT on. Rossendale needs affordable quality housing within existing communities not new expensive slums for outsiders to purchase as commuter homes in areas where there is no infrastructure or possibility of newcomers being absorbed into the local communities

Rosendale BC has an obligation to act in a responsible, moral and ethical manner when actions that will damage our borough in so many ways are proposed AND needs to respect the opinions and knowledge of local communities when making making decisions that will affect them, their families, their lives, their area and their planet.

Yours faithfully

Marie-Louise Charlton
[REDACTED]
[REDACTED]

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

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]

14/10/21

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

My husband and I are writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before to preserve areas such as this for future generations and the sake of the planet.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the

conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC's website, but should be retained under retention of records legislation applicable to public bodies.

- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair?

There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn't a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy.

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and the affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

- 5 bed detached – 5 in total
- 4 bed detached – 27 in total
- 3 bed detached – 12 in total
- 3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

- 2 bed semi mews – 10 in total,
- 3 bed semi mews – 10 in total
- 4 bed semi mews – 2 in total
- 2 bed bungalow – 1 in total

2. The development is implemented in accordance with an agreed design code.

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or

architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the **only access road** through the village

“Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would be creating an accident black spot. Crossing the road safely is a significant issue. There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of

the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road

4. Heritage Impact Assessment

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.

This investigation needs to be **commissioned independently** and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

7. Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

8. A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

9. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

10. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambledon Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

11. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”, Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

12. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

13. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents.

The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

14. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

15. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is no where near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

J I Lofthouse
S J Lofthouse

Dear Sir/ Madam

Please find attached representations in relation to the Consultation on the Schedule of Proposed Main Modifications to the Rossendale Local Plan (2019-2036) on behalf of my client United Utilities Property Services (UUPS) in respect of their site at Cowm Water Treatment Works, Whitworth.

This follows, and contains details of, a formal pre-application exercise undertaken with Lancashire County Council Highways Department in respect of the site. These discussions confirm that there are no traffic or transportation grounds on which to prevent the site being allocated for housing in the emerging Local Plan and both suitable pedestrian provision and safe access can be provided into and out of the site. This has been confirmed by LCC Highways who have confirmed that they have *"no objection to a development of up to 10 dwellings within the site"*. As such, it is considered that the site should be reincluded as a suitable housing site within the emerging Local Plan.

We trust that these representations will be considered within the next stage of work on the emerging Local Plan and would welcome an opportunity to discuss further with RBC and/or the appointed Inspectors, should this assist matters.

I would be grateful if you could please confirm safe receipt of these representations.

Please feel free to contact me should you have any queries.

Kind regards

Alice

Alice May MRTPI | Senior Planner
CBRE Limited | Planning & Development
10th Floor, One St Peters Square, Manchester, M2 3DE

[Redacted]
[Redacted] | <http://www.cbre.com>

Please consider the environment before printing this email.



CBRE Limited, Registered Office: St Martin's Court, 10 Paternoster Row, London, EC4M 7HP, registered in England and Wales No. 3536032. Regulated by the RICS.

This communication is from CBRE Limited or one of its associated/subsidiary companies. This communication contains information which is confidential and may be privileged. If you are not the intended recipient, please contact the sender immediately. Any use of its contents is strictly prohibited and you must not copy, send or disclose it, or rely on its contents in any way whatsoever. Reasonable care has been taken to ensure that this communication (and any attachments or hyperlinks contained within it) is free from computer viruses. No responsibility is accepted by CBRE Limited or its associated/subsidiary companies and the recipient should carry out any appropriate virus checks.

Forward Planning
Rossendale Borough Council
Business Centre
Futures Park
Bacup
OL13 0BB



14 October 2021

By email only forwardplanning@rossendalebc.gov.uk

Dear Sir/Madam

ROSSENDALE LOCAL PLAN (2019 - 2034) - CONSULTATION ON PROPOSED MAIN MODIFICATIONS TO THE LOCAL PLAN

I write on behalf of my client, United Utilities Property Services (UUPS), in respect of their site at Cowm Water Treatment Works, Whitworth (ref. H69), in response to the consultation on the Proposed Main Modifications to the Local Plan published by Rossendale Borough Council (RBC) for a period of 6 weeks from 3 September – 15 October 2021.

The site comprises land adjacent to Cowm Reservoir which is within the ownership of United Utilities and has been identified as being surplus to requirements. Over the last 5+ years, CBRE has held numerous discussions with the Forward Planning Team at RBC and has submitted a number of representations on behalf of UUPS in respect of the site to a variety of Local Plan documents. As such, this letter should be read alongside the previous detailed representations made by UUPS, including but not limited to the following:

- Letter from CBRE to Forward Planning in response to the consultation on the second tranche of documents within the Examination Library published by Rossendale Borough Council (RBC), dated 19 March 2021;
- Letter from United Utilities to Forward Planning following the Examination Hearings dated 15 April 2020; and
- Letter from CBRE on behalf of UUPS in response to the Rossendale Local Plan - Call for Additional Development Sites, dated 17 March 2016.

SITE AND SURROUNDINGS

The site comprises the former Cowm Water Treatment Works, located off Tong End in Whitworth, approximately 600m to the west of Market Street. It is within easy access of the facilities and services on offer in Whitworth. The entire site extends to approximately 2.55 hectares. The site is adjacent to the urban boundary and adjoins existing residential development. The former works is vacant and in need of redevelopment.

Tong End runs in a generally north – south direction past the existing access to the allocation site. The existing access is approximately 5.5 metres in width at its bellmouth with Tong End, which it joins via circa 2 metre kerbed radii arrangements to both sides.

To the north of the access, Tong End becomes Back Cowm Lane and includes a footway along its western side. This footway, which is separated from the carriageway by a railing, runs for a distance of approximately 200 metres to the access to Cowm Reservoir. Along this section, the Back Cowm Lane carriageway is approximately 5.5 metres in width.

North of the access, Back Cowm Lane is subject to a 30mph speed limit, provides access to the reservoir and a quarry only, and has no links to the wider highway network.

South of the access, Tong End runs for a distance of approximately 200 metres to its junction with Cowm Park Way (N), Tong Lane and Cowm Park Way (S), which it joins as the minor arm of a priority controlled crossroads arrangement. Tong End is subject to a 20mph speed limit along this length.

Between the access and the Cowm Park Way (N) / Tong Lane / Cowm Park Way (S) junction, the Tong End carriageway varies in width from around 4.8 to 7.3 metres. Along this length, vehicles park on the west side of Tong End along the length between No.17 and No.27.

Immediately to the south of the access to the site, there is a short length of circa 1.9m wide footway on the west side of Tong End which heads south for a distance of approximately 3 metres. There is then no footway for a distance of approximately 35 metres, with pedestrians being required to walk in the carriageway. At this point, there is a footway of circa 0.7 metres in width heading south for a distance of approximately 12 metres, before the footway widens to circa 2 metres. From here, the footway continues south to the Cowm Park Way (N) / Tong Lane / Cowm Park Way (S) junction and links to the wider pedestrian network.

Whitworth is one of the key settlements within the borough where the area vision seeks to achieve the remediation and redevelopment of vacant and under used land and buildings such as the building on this site. Although the site is currently located within the Green Belt, it represents an opportunity to redevelop a site which includes an existing building which is non-traditional in construction and poor quality in appearance.

Whitworth is served by bus routes with bus stops located in walking distance of the site. These buses link Whitworth with Bacup, Rochdale and in turn Manchester and surrounding towns. The site is in close proximity to services and amenities available in Whitworth, which is located approximately 600m from the site.

BACKGROUND AND CONTEXT

As set out above, the site has been promoted by UUPS through the Local Plan over a number of years and was taken forward as a proposed housing allocation within previous versions of the emerging Local Plan (ref. H69 Cowm Water Treatment Works, Whitworth). It was earmarked to deliver 20 units within Years 6-10 of the Plan.

Local Plan EiP

In advance of the Local Plan Examination in Public (EiP) Hearings held in September and October 2019, the Inspectors published their 'Matters, Issues and Questions' (MIQs) in July 2019. Matter 19 related to housing site allocations within Whitworth, Facit and Shawforth and sought to assess whether the proposed housing allocations in Whitworth, Facit and Shawforth are justified, effective, developable/deliverable and in line with national policy.

In relation to site H69 – Cowm Water Treatment Works, Whitworth, the following general questions were set out within the MIQs:

ii) Is the site capable of being safely accessed? Have the concerns of the Local Highways Authority been satisfied?

iii) What implications does the underground reservoir have on site capacity and the achievability of development?

iv) What effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?

It is understood that the Highway Authority had originally raised concerns to RBC about the site (ref. H69) being allocated for up to 20 units in the Local Plan due to the constraints on Tong End itself and the site access arrangements. The issue of access in relation to question ii) above was discussed at the EiP and it is understood that verbal representations were made by Lancashire County Council (LCC) Highways; however, there is no transcript available stating the issues raised, albeit we understand from RBC that these concerns were regarding access arrangements and whether third party land would be required to provide sufficient access.

Post EiP Transport Work

In May 2020, transport consultants CBO Transport prepared and (through UUPS) submitted a drawing to RBC which demonstrated that sufficient land is available within United Utilities' ownership to accommodate a new access of an appropriate width for residential development. Following on from this, LCC Highways sent an email to RBC in August 2020 stating the following:

“...there are sections along Tong Lane which have inadequate pedestrian provision. It may be possible to improve these facilities by introducing localised footway widening at the expense of carriageway width and control traffic with a priority give way section. Obviously this will need to take account of the existing users of the lane particularly the needs of the quarry operator and may subsequently prove to be impractical in which case the sustainability of the site would be questionable.

The revision of the site access would overcome the access comments previously raised and the absence of any land ownership constraints would indicate that an acceptable design is achievable. However the indicative plan provided for the access would take the access point beyond the limit of highway adoption on Tong Lane consequently, unless an additional section of Tong Lane is offered for dedication as highway (adopted) the estate roads will remain private.

It should also be noted that Tong Lane is a popular route for pedestrians and visitors to Cowm Reservoir and its water sports facilities”.

It was considered, at that time, that the issue of pedestrian provision was a matter for a subsequent planning application, and that no further work was required in this respect to support the allocation of the site for residential development given that the site is in a suitable location for housing development, is available and could be viably developed at the point envisaged (Years 6-10) and therefore meets the ‘developable’ criteria as set out within NPPF (July 2021).

Schedule of Actions ref. 13.2

Following the EiP, the Inspectors asked for additional information on the Local Plan and Evidence Base documents, as set out in the Schedule of Actions (document EL6.001). RBC then responded to these Actions within the Examination Library 8 with a second tranche of documents being published for consultation in March 2021.

Of relevance to Cowm Water Treatment Works (ref. H69) was ‘Schedule of Actions Matter 13 (Housing Site Allocations: Whitworth, Facit And Shawforth) - Actions 13.1 – 13.2’. Action ref. 13.2 required RBC to seek the advice of the Environment Agency (EA) on two issues in relation to the site, discussed at the Hearing sessions, namely:

- i. Views on the suitability of the proposed housing scheme (owing the site’s proximity to Cowm Reservoir and taking into account the recent Whaley Bridge dam incident); and
- ii. Views on whether scenarios of reservoir dam failure modelling are needed to inform the allocation (as set out in the SFRA level 2 report).

No issues relating to access or highways matters were raised at this stage or set out within this schedule.

UUPS submitted detailed representations to the consultation in March 2021, in response to these matters, setting out that it is considered that UUPS consider that the risk from either dam failure scenarios or reservoir flooding is extremely low, and that the site is suitable for housing development. Furthermore, that UUPS do not consider that there is a requirement for further modelling. This built upon evidence provided by United Utilities back in early 2020 as set out within their letter to RBC dated 15 April 2020 (a copy of which is provided at **Appendix 1**) and can be summarised as follows:

- United Utilities manages its reservoirs, including Cowm, to comply with the statutory duties under the Reservoir Safety Act 1975 and the Flood and Water Management Act, to make sure that all reservoirs are properly maintained and monitored in order to detect and repair any issues before problems arise.
- United Utilities will continue the existing strict management and maintenance regime for Cowm Reservoir. This will ensure that the site is safe for its lifetime
- The EA Inundation maps show that, in the unlikely event of reservoir flooding, a large linear area to the south of Cowm Reservoir could be affected as well as existing residential properties in the area. However, we consider that the ongoing management and a maintenance of Cowm Reservoir would prevent such an event occurring.
- Development of surplus land to the south of the reservoir will not exacerbate the risk of flooding elsewhere.
- The Council has consulted Lancashire Fire and Rescue and a Planning Liaison Officer at the Fire Brigade, as well as the Lead Local Flood Authority (Lancashire County Council). No concerns were raised in respect of Cowm reservoir’s flood risk.
- The site passes the NPPF Exception Test - the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.

Inspectors Post Hearing Letter

Following the close of the consultation in March 2021, the Inspectors Post Hearing Letter dated 30 June 2021 was published. This set out that housing allocation H69 – Cowm Water Treatment Works, Whitworth should be deleted from the Plan. The letter states at paragraph 28:

“There is no clear evidence before us to show that suitable pedestrian provision is deliverable, or that safe access can be provided. It is therefore considered that the allocation is not justified or effective. Accordingly, exceptional circumstances are not demonstrated and the site should be deleted from the Plan and retained in the Green Belt.”

No further evidence/ reasoning was provided to support this conclusion.

Main Mods Consultation

The Main Modifications (‘main mods’) to the Local Plan have now been published for consultation, with a closing date of Friday 15 October 2021. The main mods confirm the Inspectors position as set out within the Post Hearing Letter (summarised above) and suggest wording to delete housing allocation H69 – Cowm Water Treatment Works, Whitworth (and thus retain it within the Green Belt).

Given that no further issues relating to dam failure/ flooding or similar were raised within the Inspectors Post Hearing letter, it is assumed that the highways/ access issues are the only remaining concern in relation to the site. Therefore, the remainder of these representations sets out the position in relation to transport and highways considerations, specifically relating to vehicular and pedestrian access and egress to and from the site.

TRANSPORT AND HIGHWAYS CONSIDERATIONS

In order to tackle the issues raised by the Inspectors, UUPS submitted a formal pre-application request to LCC Highways in October 2021, in order to discuss and seek to address these comments, and come to a mutually agreeable position, to support the re-inclusion of the site as a housing allocation and its release from the Green Belt.

A copy of the pre-application Technical Note prepared by CBO Transport, along with relevant annexes, is provided at **Appendix 2**. This set out the technical considerations and provides details of a 12 hour traffic survey undertaken on 28 September 2021 and observations from a site visit undertaken on 29 September 2021.

The Note was prepared on the basis of a reduced number of units being accommodated within the site. The site was previously earmarked in earlier versions of the emerging Local Plan for 20 units based upon an average density of 30 dwellings per hectare (dph) being applied across the site; however, UUPS has now reviewed this suggested total number of units and consider that a lower density would be appropriate. A figure of 10 dwellings to be delivered across the site is now considered to be realistic and has therefore been used as the basis for the transport and highways assessment.

In summary, CBO Transport consider that there are no traffic or transportation grounds on which to prevent the site being allocated for housing in the emerging Local Plan, on the basis of the following:

- CBO observations during the afternoon of 29 September 2021 showed that, whilst there were a number of HGVs using Tong End to access the quarry¹, vehicles were able to pull over in the wider areas of Tong End and between parked cars further south on Tong End to make way for such HGVs and allow them to pass with minimal issues;
- With regard to pedestrians, CBO observations confirmed that they were able to safely walk up and down the west side of the Tong End carriageway over the circa 35 metre length between the existing footway provision;
- There are no existing highway safety issues that should impact on consideration of the acceptability of access and pedestrian provision / activity in the vicinity of the site;
- Based on the minimal traffic flows on Tong End past the site, the identified potential access arrangement from Tong End is suitable to safely serve the proposed development and acceptable and appropriate from a design and safety perspective;
- The traffic generation associated with the site (based on a 10 unit scheme) would be minimal, with a maximum two way flow of 8 vehicles during any one hour. This equates to just one additional vehicle every seven and a

¹ The survey records a daily flow of circa 500 vehicles which includes 100 HGVs accessing the quarry.

half minutes. The addition of the site allocation traffic to the observed traffic flows would also not result in total flows on Tong End of more than 57 vehicles. This equates to a total of less than one vehicle travelling along Tong End every minute. It is therefore considered that the existing Tong End could accommodate these modest increases and that the identified level of traffic flow could be accommodated at the access to the allocation site; and

- A potential pedestrian improvement scheme has been identified for Tong End which is considered suitable to safely accommodate the additional pedestrian movements associated with residential development of the site, together with existing pedestrians, without resulting in the loss of on-street parking or quarry traffic being impeded.

LCC Highways Response

The formal written pre-application response from LCC Highways dated 13 October 2021 (a copy of which is provided at **Appendix 3**) confirms the following:

- The proposed pedestrian improvement scheme detailed on Drawing CBO-0628-002 and which includes a pedestrian walkway and footway widening adjacent to 27 Tong End scheme is considered suitable to mitigate the impact of the development traffic on Tong Lane. This could be delivered under a S278 agreement with Lancashire County Council.
- The proposed modifications to the site access detailed on Drawing CBO-0628-002² is considered suitable to accommodate the development traffic. The proposed splays are acceptable and can be achieved within UUPS land or the adopted highway.
- No internal layout is submitted at this stage; however, LCC Highways has provided details of future considerations in respect to roads (including the need to design to Manual for Streets), bridges, refuse and parking, but consider that these matters can be dealt with at a later date.

The Note concludes as follows:

“The development traffic from the proposed 10 dwellings can be mitigated with the pedestrian improvements on Tong Lane and site access widening. Additional measures are required internally to provide infrastructure in accordance with the Manual for Streets and to adoptable standards. Subject to the mitigation and an internal layout which satisfies the Highway Authority, there is no objection to a development of up to 10 dwellings.” [CBRE emphasis]

SUMMARY

These representations provide clear evidence demonstrating that there are no traffic or transportation grounds on which to prevent the site being allocated for housing in the emerging Local Plan; indeed, both suitable pedestrian provision and safe access can be provided into and out of the site. This has now been confirmed and agreed by LCC Highways, by way of a formal written pre-application response, setting out that they have no objection to a development of up to 10 dwellings within the site.

UUPS therefore consider that the site’s allocation for housing is both justified and effective. Accordingly, exceptional circumstances are demonstrated, and the site should be retained as a housing site within the emerging Plan and released from the Green Belt. The site will provide much needed housing to ensure there is sufficient choice and competition in the market to the benefit of the locality and wider Borough.

We understand that following the close of consultation on Friday 15 October 2021, the Inspectors and RBC will review any written representations received during this period and the Inspectors’ Report will be published shortly thereafter. We therefore politely request that the site is reincluded as a suitable housing site within the emerging Local Plan.

² The proposed modification shows the existing access having a 4.5 metre radius to the south, a 2-metre radius to the north and the access widened to 5.5 metres over the first 20 metres; tracking for 2 cars to pass side by side is included; splays of 2.4 x 59 metre to the north and 2.4 x 43 metre splay to the south.

I trust that these representations provide additional justification in response to the Inspectors concerns as set out within the Post Hearing Letter, and in response to the Main Mods, and we look forward to continuing discussions with RBC in respect of this site on behalf of UUPS.

Yours sincerely

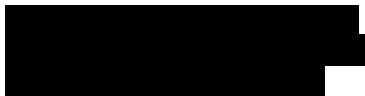


ALICE MAY

SENIOR PLANNER – PLANNING & DEVELOPMENT

Enc: Appendix 1 – Letter from United Utilities to RBC dated 15 April 2020
Appendix 2 - Technical Note prepared by CBO Transport
Appendix 3 – LCC Highways formal response dated 13 October 2021

Cc:



Appendix 1 – Letter from United Utilities to RBC dated 15 April 2020

Nathaele Davies
Forward Planning
Rossendale Borough Council
The Business Centre
Futures Park
Bacup
OL13 0BB

Emailed to: [REDACTED]

Dear Nathaele

Rossendale Local Plan – Housing Allocation H69 – Cowm Water Treatment Works

Further to the Local Plan Examination hearing sessions and our recent correspondence we set out below some additional information requested by the Planning Inspector in relation to the above site.

Cowm Reservoir alongside the adjacent land which is surplus to requirements is within the ownership of United Utilities and is being put forward as a proposed housing allocation for years 6-10 of the Local Plan (Housing Allocation 69). In accordance with the definition of a 'developable' site as set out in the Glossary of the National Planning Policy Framework (NPPF, 2019), we trust that the information we set out below will demonstrate that the site is in a suitable location for housing development, the site is available and the site could be viably developed at the point envisaged.

With regard to the availability of the site, the site is surplus to requirements and is available for development. The site is within the sole ownership of United Utilities.

With regard to the viability of the site, the site is within a suitable location for residential development and will provide a natural extension to the existing residential areas located to the east, south and west. There are no known onerous constraints which would preclude the site coming forward for development in years 6-10 of the Local Plan. This timescale will provide sufficient time to obtain planning permission and attract interest from developers, resulting in the sale of the site. Given the size of the site and the estimated density (with 10 dwellings being delivered in 2024-25 and the remaining 10 being delivered in 2025-26) the site is likely to appeal to smaller regional housebuilders and housing providers who may be better placed to respond to a changing economic environment. On this basis we believe the redevelopment of the site to be viable.

In terms of the suitability of the site for residential development this relates directly to the matters raised by the Inspector. We set out these matters in turn below:

Management and Maintenance of Cowm Reservoir

United Utilities manages its reservoirs, including Cowm, to comply with the statutory duties under the Reservoir Safety Act 1975. United Utilities is proactive in managing its reservoirs and operates to standards believed to be best practice in the UK water industry.

With regard to the management and maintenance of Cowm reservoir United Utilities carries out 48 hour monitoring of the condition of the reservoir. Grass cutting is carried out regularly to ensure the embankment can be inspected. The Supervising Engineer inspects the reservoir every 6 months and valves are tested at this visit.

NPPF Exception Test

It is noted that the 2016 Strategic Flood Risk Assessment (SFRA) identifies the site within Flood Zone 2 and the Inspector confirmed that the Exception Test should be applied. In accordance with NPPF, to pass the Exception Test, it should be demonstrated that the benefits of the development outweigh the risk of flooding; and that “the development will be safe for its lifetime” as well as not increasing flood risk elsewhere.

The site meets the ‘developable’ criteria as set out within NPPF given that the site is in a suitable location for housing development, is available and could be viably developed at the point envisaged (years 6-10). The site will provide much needed housing to ensure there is sufficient choice and competition in the market to the benefit of the locality and wider Borough. The ongoing strict management and maintenance regime for the adjacent reservoir will ensure that the site is safe for its lifetime and furthermore it will not increase the risk of flooding elsewhere.

On this basis we believe that this site complies with and passes the Exception Test.

Modelling

We note that the 2019 Rossendale Local Plan Flood Risk Incorporating Sequential Test Topic Paper states that the “western area of site may be deliverable though scenarios of reservoir dam failure must be modelled”. With regard to modelling, information is available from the Environment Agency by way of their Reservoir Inundation maps. These maps show that in the unlikely event of reservoir flooding a large linear area to the south of Cowm Reservoir could be affected.

As set out above, the ongoing management and a maintenance of the reservoir would prevent such an event occurring. Residential development on surplus land to the south of the reservoir would not exacerbate this scenario.

Conclusion

We believe that the information set out above addresses the matters raised by the Inspector namely by demonstrating that the site could be delivered within years 6-10, the existing strict management and maintenance regime for the adjacent reservoir will ensure the site is safe for its lifetime and development of this site will not exacerbate flooding elsewhere.

We would be grateful if the information set out above could be presented to the Inspector, however if you require any further information or clarification in the interim then please do not hesitate to contact me.

Yours sincerely

Bernadette McQuillan
Planning Manager
United Utilities Water Limited

Appendix 2 - Technical Note prepared by CBO Transport



1 Introduction

- 1.1 CBO Transport [CBO] has been commissioned by United Utilities Property Services [UUPS] to provide traffic and transportation advice in relation to a proposed residential allocation at Cowm Water Treatment Works, Whitworth ('the site').

Background

- 1.2 In previous versions of Rossendale Borough Council's [RBC] emerging Local Plan, Housing allocation H69 Cowm Water Treatment Works, Whitworth was earmarked to deliver 20 units within Years 6-10. However, following the Local Plan EIP, the Inspectors Post Hearing Letter dated the 30th June 2021 set out that Housing allocation H69 should be deleted from the Plan. The letter states at paragraph 28:

"There is no clear evidence before us to show that suitable pedestrian provision is deliverable, or that safe access can be provided. It is therefore considered that the allocation is not justified or effective. Accordingly, exceptional circumstances are not demonstrated and the site should be deleted from the Plan and retained in the Green Belt."

- 1.3 It is not clear what the evidence / reasoning was which supported this view. However, the highways / access issues appear to be the only concern in relation to the site.
- 1.4 Prior to the above, in May 2020, CBO prepared and (through UUPS) submitted a drawing to RBC which showed how access could be provided to the site.
- 1.5 Following on from this, Lancashire County Council [LCC] highways sent an email to RBC in August 2020 stating the following:

"Taking on board the previous comments provided by Kelly, I would agree that there are sections along Tong Lane which have inadequate pedestrian provision. It may be possible to improve these facilities by introducing localised footway widening at the expense of carriageway width and control traffic with a priority give way section. Obviously this will need to take account of the existing users of the lane particularly the needs of the quarry operator and may subsequently prove to be impractical in which case the sustainability of the site would be questionable."

The revision of the site access would overcome the access comments previously raised and the absence of any land ownership constraints would indicate that an acceptable design is achievable. However the indicative plan provided for the access would take the access point beyond the limit of highway adoption on Tong Lane consequently, unless an additional section of Tong Lane is offered for dedication as highway (adopted) the estate roads will remain private.

It should also be noted that Tong Lane is a popular route for pedestrians and visitors to Cowm Reservoir and its water sports facilities".

- 1.6 It was considered at that time that the issue of pedestrian provision was a matter for a planning application and that no further work was required in this respect to support the allocation of the site for residential development.

Current Position

- 1.7 The Main Modifications ('main mods') to the Local Plan have now been published for consultation, with a closing date of Friday the 15th October 2021. The main mods confirm the Inspector's position as set out within the Post Hearing Letter and suggest wording to delete housing allocation H69 (and thus retain it within the Green Belt).
- 1.8 Based on the above, RBC recommended that UUPS go through the LCC Highways pre-app process to discuss and seek to address these comments, and come to a mutually agreeable position, with a view to obtaining pre-application advice in writing which can be appended to or included within subsequent representations to the main mods consultation, to support the re-inclusion of the site as a housing allocation and its release from the Green Belt.
-

- 1.9 After the close of consultation on Friday the 15th October 2021, the Inspector and RBC will review any received written representations received during this period and the Inspector's Report will be published thereafter.
- 1.10 In light of the above, CBO held further discussions with LCC highways which resulted in an email being sent to LCC highways on the 6th September 2021 to seek feedback on the following:
- It was understood that LCC's feedback to date had been based on the site delivering 20 units. Would there be a lower number of dwellings upon which LCC would support the site being released from the Green Belt based on the previously identified access arrangement and without any off-site improvements?;
 - Could evidence potentially be presented which would allow LCC to conclude that no off-site pedestrian improvements would be required based on a 20 dwelling scheme, e.g. looking at existing and additional traffic / pedestrian movements and accident records?;
 - If an off-site pedestrian improvement scheme were to be investigated (based on OS mapping), and it were to appear to be deliverable, would LCC be happy to agree it to a sufficient degree at this stage to support the release of the site from the Green Belt and its allocation for housing?

- 1.11 Following on from the above, LCC replied on the 20th September 2021 stating:

"A lower number of units may be acceptable subject to further evidence being collected as you suggest in your email. I anticipate that any number of units would require a scheme to support pedestrian movements on Tong Lane. We wouldn't support any loss of on-street parking as a result of a scheme and it must not impede the quarry traffic."

Dwelling numbers

- 1.12 As set out above, the site was previously earmarked in earlier versions of the emerging Local Plan for 20 units based upon an average density of 30 dwellings per hectare (dph) being applied across the site. UUPS has now reviewed this suggested total number of units and consider that a lower density would be appropriate. A figure of 10 dwellings to be delivered across the site is now considered to be realistic. This Note has therefore been prepared on the basis of the site accommodating 10 units.

Purpose / Scope of Note

- 1.13 In the context of the above, this Note has been prepared to accompany a formal request for pre-application advice from LCC Highways in order to **address LCC's comments**. As part of this request formal written advice and, if necessary a pre-application meeting, is sought, which can in turn be appended to, or included within, any representations to the main mods to support the re-inclusion of the site as a housing allocation and its release from the Green Belt.
- 1.14 It is important to note that, at this stage, UUPS is seeking LCC Highway's **agreement** in principle that the site can be released from the Green Belt and allocated for housing and is no looking to secure a detailed planning permission for the site. It is therefore considered that any evidence provided at this stage should be proportionate.
- 1.15 Based on the above, this note is set out in 7 sections including this introduction.
- 1.16 Section 2 provides details of the highway network, whilst Section 3 sets out details of observed traffic and pedestrian flows along Tong End past the allocation site access.
- 1.17 Section 4 then updates the access drawing submitted in May 2020 based on the most up to date OS mapping data.
- 1.18 Section 5 goes on to consider the additional traffic and pedestrian movements associated with residential development on the allocation site, together with the suitability of the identified access arrangement, and existing Tong End, to accommodate the identified traffic movements.
- 1.19 Following on from the above, Section 6 investigates the potential for providing an off-site pedestrian improvement scheme on Tong End and considers its suitability to accommodate the identified traffic and pedestrian movements.
- 1.20 The conclusions, recommendations and requested feedback are set out in Section 7.

2 Highway Network

Tong End / Back Cowm Lane

- 2.1 Tong End runs approximately north – south past the existing access to the allocation site. The existing access is approximately 5.5 metres in width at its bellmouth with Tong End, which it joins via circa 2 metre kerbed radii arrangements to both sides.
- 2.2 To the north of the access, Tong End becomes Back Cowm Lane and includes a footway along its western side. This footway, which is separated from the carriageway by a railing, runs for a distance of approximately 200 metres to the access to Cowm Reservoir. Along this section, the Back Cowm Lane carriageway is approximately 5.5 metres in width.
- 2.3 North of the access, Back Cowm Lane is subject to a 30mph speed limit, provides access to just the reservoir and a quarry and has no links to the wider highway network.
- 2.4 South of the access, Tong End runs for a distance of approximately 200 metres to its junction with Cowm Park Way (N), Tong Lane and Cowm Park Way (S), which it joins as the minor arm of a priority controlled crossroads arrangement. Tong End is subject to a 20mph speed limit along this length.
- 2.5 Between the access and the Cowm Park Way (N) / Tong Lane / Cowm Park Way (S) junction, the Tong End carriageway varies in width from around 4.8 to 7.3 metres. Along this length and during a site visit, vehicles were seen to park on the west side of Tong End along the length between No.17 and No.27.
- 2.6 Immediately to the south of the access to the site, there is a short length of circa 1.9m wide footway on the west side of Tong End which heads south for a distance of approximately 3 metres. There is then no footway for a distance of approximately 35 metres, with pedestrians being required to walk in the carriageway. At this point, there is a footway of circa 0.7 metres in width heading south for a distance of approximately 12 metres, before the footway widens to circa 2 metres. From here, the footway continues south to the Cowm Park Way (N) / Tong Lane / Cowm Park Way (S) junction and links to the wider pedestrian network.

On Site Observations

- 2.7 During a site visit on 29th September 2021, vehicles were seen to park on the west side of Tong End along the length between No.17 and No.27. In addition, and as part of a 12 hour survey on the lane as detailed below, observations showed that, between No.27 and the access to the site, there was only one vehicle parked for a prolonged period outside No.27. Other than that, there was just one other vehicle parked just south of the access to the allocation site been circa 8:20 – 11:55 and 15:45 – 17:15.
- 2.8 In addition to the above, CBO observations during the afternoon of the 29th September showed that, whilst there were a number of HGVs using Tong End to access the quarry, vehicles were able to pull over in the wider areas of Tong End and between parked cars further south on Tong End to make way for such HGVs and allow them to pass with minimal issues.
- 2.9 With regard to pedestrians, CBO observations during the afternoon showed that they were able to safely walk up and down the west side of the Tong End carriageway over the circa 35 metre length between the existing footway provision.

Personal Injury Accident Record

- 2.10 Accident data that is freely available on the internet shows there have been no personal injury accidents recorded along Tong End or Back Cowm Lane over the circa 400 metre distance between the Back Cowm Lane / Back Lane junction to the north and the Cowm Park Way (N) / Tong Lane / Cowm Park Way (S) / Tong End junction to the south.
- 2.11 The above indicates that there are no existing highway safety issues that should impact on consideration of the acceptability of access and pedestrian provision / activity in the vicinity of the allocation site.

3 Observed Traffic / Pedestrian Flows

Traffic Flows

- 3.1 To inform consideration of the suitability of Tong End to serve residential development at the site, 12 hour traffic survey data has been obtained along Tong End past the site access for Tuesday 28th September 2021. This survey was undertaken by an independent survey company and included a fully classified link count between the hours 7:00 & 19:00. The raw survey data from this survey is included at **Appendix A**.
- 3.2 Based on this survey, Table 3.1 below sets out the traffic flows on Tong End past the access to the allocation site for the traditional 8:00 – 9:00 and 17:00 – 18:00 peak hours, the 15:00 – 16:00 afternoon school peak, other busiest hours and the full 12 hour period. Traffic flows are shown for all vehicles (including HGVs) and just HGVs.

Table 3.1: Tong End: Traffic Survey Results

	Northbound		Southbound		Total	
	All Veh	HGVs	All Veh	HGVs	All Veh	HGVs
7:15 -8:15	26	4	25	8	51	12
8:00 – 9:00	20	3	23	5	43	8
9:30 – 10:30	24	11	26	10	50	21
15:00 – 16:00	16	5	14	6	30	11
16:45 – 17:45	14	1	19	1	33	2
17:00 – 18:00	12	2	15	1	27	3
7:00 – 19:00	201	48	204	52	405	100

- 3.3 As can be seen from the above, traffic flows along Tong End past the site are low, with a maximum total flow of around 50 vehicles during the hours 7:15 – 8:15 and 9:30 – 10:30. During the traditional 8:00 – 9:00 morning peak and 17:00 – 18:00 evening peak, the total traffic flows are lower than during the busiest hours, with total flows of 43 vehicles and 27 vehicles respectively.
- 3.4 The above table also shows that there is a regular flow of HGVs along Tong End associated with the quarry operation, with a maximum total flow of 21 HGVs during the hour 9:30 – 10:30. However, outside the period 9:00 to 10:45, these flows do reduce to around half at the next busiest hours of 7:15 – 8:15 and 15:00 – 16:00.

Pedestrian Flows

- 3.5 In addition to the above and as part of the traffic survey, pedestrian movements along Tong End past the access to the allocation site were also recorded. These pedestrians were broken down in individual adults, individual children and groups, with the numbers of groups and number in each group being recorded. The raw survey data from this survey is included at **Appendix A**.
- 3.6 Based on this survey, Table 3.2 below sets out the pedestrian flows on Tong End past the site for the same periods as the traffic flows.

Table 3.2: Tong End: Pedestrian Survey Results

	Northbound				Southbound				Total			
	Ad	Ch	Gr	Tot	Ad	Ch	Gr	Tot	Ad	Ch	Gr	Tot
7:15 -8:15	6	0	0	6	6	1	0	7	12	1	0	13
8:00 – 9:00	3	0	1	5	2	0	1	6	5	0	2	11
9:30 – 10:30	2	0	1	4	3	0	2	7	5	0	3	11
15:00 – 16:00	1	0	0	1	5	0	1	9	6	0	1	10
16:45 – 17:45	4	0	3	12	2	0	1	4	6	0	4	16
17:00 – 18:00	6	0	3	14	4	0	2	8	10	0	5	22
7:00 – 19:00	47	0	12	75	47	1	12	76	94	1	24	151

- 3.7 As can be seen from the above, there was a regular flow of pedestrians along Tong End past the access to the site, with a maximum total flow of around 20 people during the hour 17:00 to 18:00. During the remaining periods, pedestrian flows totalled around 10 to 15 people an hour.

4 Potential Access Modifications

- 4.1 Based on CBO's observations on site in September 2021, and the most up to date OS mapping, the potential access drawing submitted in May 2020 has been updated. This amended potential access arrangement is shown in **drawing CBO-0628-002 at Appendix B**.
- 4.2 **Drawing CBO-0628-002 at Appendix B** therefore shows the existing access being modified to provide a 4.5 metre radius to the south, a 2 metre radius to the north and the access widened to 5.5 metres over the first 20 metres. This access arrangement has been designed on the basis that there would be minimal (if any) need for general traffic, and no need for refuse vehicles, to travel to and from the north given that this just serves the reservoir and quarry.
- 4.3 Based on this arrangement, drawing CBO-0628-002 also shows that there is sufficient space for a car to enter the site from the south (at 8mph) at the same time as one waiting to leave. There is also sufficient space within the first 20 metre length of the access for two cars to pass without the need for a vehicle to reverse onto Tong End.

Visibility Provision

- 4.4 With regard to visibility provision at the access, the use of Manual for Streets [MfS] is considered appropriate in this instance. As a result, and based on the 30mph speed limit to the north of the access and 20mph speed limit to the south, design speeds of 37mph to the north and 30mph to the south have been adopted.
- 4.5 Using these design speeds, a 'y' distance of 59 metres is required looking to the north of the access, whilst a 'y' distance of 43 metres is required looking to the south. In terms of the 'x' distance, a 2.4 metre provision is considered sufficient.
- 4.6 Based on the above, **CBO drawing CBO-0628-002** shows the required 2.4 x 59 metre splay is achievable to the north. To the south, the required 2.4 x 43 metre splay is achievable to a point circa 2 metres from the nearside carriageway edge.
- 4.7 Measuring to this point to the south does not accord with the typical requirement to measure to the nearside kerbline. However, given the footway provision to the south of this 43 metre point and the required positioning of northbound vehicles on Tong End, the inability to see the area of carriageway between the carriageway edge and the visibility splay will not impact on the ability of traffic exiting the site safely seeing approaching vehicles to the 43 metre point. It will also not prevent vehicles travelling north on Tong End seeing vehicles leaving the access from this 43 metre point.

Summary

- 4.8 Based on the above and the minimal traffic flows on Tong End past the site, the identified potential access arrangement from Tong End is considered suitable to safely serve the proposed development and acceptable and appropriate from a design and safety perspective.

5 Potential Traffic / Pedestrian Generations & Traffic Impact

General

- 5.1 As set out in the introduction, the site was earmarked to deliver 20 units through the Local Plan. However, UUPS has now reassessed the realistic number of units that could be achieved on this site and believe this to be 10 units.
- 5.2 Based, therefore, on a 10 dwelling scheme, the TRICS database has been interrogated for the sub land use of 'Houses Privately Owned' in order to determine the trip rates associated with such a residential development. To achieve a broad dataset, sites from London and Ireland have been removed and the sites chosen based on a 6 to 30 dwelling range. Multi modal sites have also been utilised. TRICS outputs for this interrogation are included in **Appendix C**.
- 5.3 For the vehicle trip rates and to provide a level of robustness, all of the trip rates for taxis and public transport users, together with half the pedestrian trip rates, have been added to the vehicle trip rates. The trip rates arising from this approach and set out below are therefore considered highly robust.

- 5.4 For the pedestrian trip rates and despite the above allowance in terms of vehicle trips, the full pedestrian trip rates have been used to derive pedestrian trips. This is again considered robust.
- 5.5 Based on this methodology, the resultant trip rates for vehicles and pedestrians are shown below in Table 5.1 for the hours set out in Section 3.

Table 5.1: Development Trip Rates

	Vehicles			Pedestrians		
	Arrivals	Departures	Total	Arrivals	Departures	Total
7:15 -8:15	0.170	0.397	0.567	0.050	0.100	0.150
8:00 – 9:00	0.261	0.511	0.772	0.097	0.157	0.254
9:30 – 10:30	0.196	0.220	0.416	0.053	0.079	0.132
15:00 – 16:00	0.413	0.368	0.781	0.148	0.136	0.284
16:45 – 17:45	0.418	0.242	0.660	0.114	0.085	0.199
17:00 – 18:00	0.432	0.236	0.668	0.110	0.089	0.199
7:00 – 19:00	3.351	3.413	6.764	0.991	1.027	2.018

- 5.6 Applying these trip rates to a 10 dwelling development, Table 5.2 below shows the resultant traffic and pedestrian generations for the site.

Table 5.2: Potential Development Traffic & Pedestrian Generations

	Vehicles			Pedestrians		
	Arrivals	Departures	Total	Arrivals	Departures	Total
7:15 -8:15	2	4	6	1	1	2
8:00 – 9:00	3	5	8	1	2	3
9:30 – 10:30	2	2	4	1	1	2
15:00 – 16:00	4	4	8	1	1	2
16:45 – 17:45	4	2	6	1	1	2
17:00 – 18:00	4	2	6	1	1	2
7:00 – 19:00	34	34	68	10	10	20

Trip Distribution

- 5.7 Given that Back Cowm Lane to the north of the site does not link to the wider highway network, all of the above traffic would travel to and from the site via Tong End to the south and its junction with Cowm Park Way (N) / Tong Lane / Cowm Park Way (S).

Traffic Impact

- 5.8 As can be seen from Table 5.2, the traffic generation associated with the allocation site would be minimal, with a maximum two way flow of 8 vehicles during any one hour. This equates to just one additional vehicle every seven and a half minutes.
- 5.9 In addition, and based on the observed traffic flows set out in Table 3.1, the addition of the site traffic (based on a 10 unit scheme) to the observed traffic flows would not result in total flows on Tong End of more than 57 vehicles. This equates to a total of less than one vehicle travelling along Tong End every minute.
- 5.10 Based on the above and our observations on site, it is considered that the existing Tong End could accommodate these modest increases and that the identified level of traffic flow could be accommodated at the access to the allocation site.

6 Potential Off-Site Pedestrian Improvement

General

6.1 In their email of the 20th September 2021, LCC stated that:

"I anticipate that any number of units would require a scheme to support pedestrian movements on Tong Lane. We wouldn't support any loss of on-street parking as a result of a scheme and it must not impede the quarry traffic."

Potential Off-Site Pedestrian Improvement Scheme

- 6.2 **Drawing CBO-0628-002 at Appendix B** therefore identifies an improvement scheme that takes on board these comments. The rationale behind this scheme is set out below.
- 6.3 Considering the existing pedestrian provision on Tong End in the first instance, there is footway of sufficient width provided on the west side running between No.21 and the southern elevation of No. 27. It is envisaged that this existing provision would be retained under any off-site pedestrian improvement scheme.
- 6.4 As set out in Section 2 and past No.27, the footway reduces to circa 0.7 metres in width for a distance of approximately 12 metres. It is therefore suggested that, as part of any pedestrian improvement scheme, this length of footway would be widened to 1 metre.
- 6.5 Whilst it is acknowledged that this modification is not a full width footway provision, it would provide a footway of sufficient width to enable a wheelchair user or a person with a pushchair to use it whilst not resulting in the loss of on-street parking or quarry traffic being impeded.
- 6.6 With this provision in place, there would then be distance of approximately 35 metres between this widened footway and the existing footway to the south of the access to the site where no footway would be provided.
- 6.7 Over this length, it is considered most appropriate to retain the existing 'walking in carriageway' arrangement but to provide a white line road marking to delineate a 1.5 metre wide advisory pedestrian area on the west side of the carriageway between the two footways.
- 6.8 With this provision in place and as shown in drawing number CBO-0628-002, the available carriageway width excluding this area would be between 4.5 and 5.1 metres. This is sufficient for two cars to pass and could accommodate the maximum hourly two way flow of 45 light vehicles (excluding HGVs) south of the site during the hour 7:15 – 8:15 based on the existing total light vehicle flows (51 total minus 12 HGVs) plus the addition of the 10 dwellings worth of traffic (6 vehicles).
- 6.9 With regard to the delineated pedestrian area, and whilst it is again acknowledged that this is not a full width footway provision, it would identify an area of sufficient width for a person to walk next to another person pushing a pushchair.
- 6.10 It is also acknowledged that this area is not a full footway provision and would still require pedestrians to walk in the carriageway. However, it is the case that residential development on the site would not increase HGV movements on Tong End and that, as set out in Table 5.2 it would not increase pedestrian movements by more than a total of 3 pedestrians in any one hour and a total of 20 pedestrians over a 12 hour period. Given that the lane already carries a total of between 10 and 22 pedestrians an hour and 151 pedestrians over 12 hours with no record of personal injury accidents, this modest increase could be safely accommodated.
- 6.11 It is also the case that, by not physically reducing the carriageway width along this length, this pedestrian area could continue to be used when required for cars and HGVs to pass, thereby ensuring quarry traffic is not impeded.

Summary

- 6.12 Based on the above, the identified potential pedestrian improvement scheme on Tong End is considered suitable to safely accommodate the additional pedestrian movements associated with residential development of the site, together with existing pedestrians, without resulting in the loss of on-street parking or quarry traffic being impeded.

7 Conclusions, Recommendations and Requested Feedback

Conclusions

7.1 Based on the findings of this Note, it is concluded that:

- UUPS is seeking LCC highway's **agreement** in principle that the site can be released from the Green Belt and allocated for housing at this stage, and not secure a detailed planning permission for the site. It is therefore considered that any evidence provided at this stage should be proportionate;
- CBO observations during the afternoon of the 29th September 2021 showed that, whilst there were a number of HGVs using Tong End to access the quarry, vehicles were able to pull over in the wider areas of Tong End and between parked cars further south on Tong End to make way for such HGVs and allow them to pass with minimal issues;
- With regard to pedestrians, CBO observations during the afternoon showed that they were able to safely walk up and down the west side of the Tong End carriageway over the circa 35 metre length between the existing footway provision;
- There are no existing highway safety issues that should impact on consideration of the acceptability of access and pedestrian provision / activity in the vicinity of the site;
- Based on the minimal traffic flows on Tong End past the site, the identified potential access arrangement from Tong End is suitable to safely serve the proposed development and acceptable and appropriate from a design and safety perspective;
- The traffic generation associated with the site (based on a 10 unit scheme) would be minimal, with a maximum two way flow of 8 vehicles during any one hour. This equates to just one additional vehicle every seven and a half minutes. The addition of the site allocation traffic to the observed traffic flows would also not result in total flows on Tong End of more than 57 vehicles. This equates to a total of less than one vehicle travelling along Tong End every minute. It is therefore considered that the existing Tong End could accommodate these modest increases and that the identified level of traffic flow could be accommodated at the access to the allocation site;
- A potential pedestrian improvement scheme has been identified for Tong End which is considered suitable to safely accommodate the additional pedestrian movements associated with residential development of the site, together with existing pedestrians, without resulting in the loss of on-street parking or quarry traffic being impeded.

Recommendations

7.2 In light of the above, CBO Transport consider that there are no traffic or transportation grounds on which to prevent the site being allocated for housing in the emerging Local Plan.

Requested Feedback

7.3 Taking account of the evidence set out in this Note, we request formal written pre-application advice from LCC Highways which supports the re-inclusion of the site as a housing allocation and its release from the Green Belt.



Appendix A: Traffic / Pedestrian Survey Data

Road: Tong End

A: Northbound

Day: Tuesday

B: Southbound

Date: 28 September 2021

Weather: Rain 07:10-11:55 & 13:53-17:18

Time	A										B									
	Car	LGV	OGVI	OGV2	P/C	M/C	PSV	Car U-Turn	LGV U-Turn	Total	Car	LGV	OGVI	OGV2	P/C	M/C	PSV	Car U-Turn	LGV U-Turn	Total
07:00	2	1	0	3	0	0	0	1	0	7	0	0	0	0	0	0	0	1	0	1
07:15	1	2	0	1	0	0	0	0	1	5	2	0	0	3	0	0	0	0	1	6
07:30	3	1	0	1	0	0	0	1	0	6	2	1	0	3	0	0	0	1	0	7
07:45	1	3	1	1	0	0	0	0	0	6	4	0	0	1	0	0	0	0	0	5
08:00	7	2	0	0	0	0	0	0	0	9	5	1	0	1	0	0	0	0	0	7
08:15	1	0	0	2	0	0	0	0	0	3	1	2	0	0	1	0	0	0	0	4
08:30	1	0	0	1	0	0	0	0	0	2	3	0	0	2	0	0	0	0	0	5
08:45	4	2	0	0	0	0	0	0	0	6	5	0	0	2	0	0	0	0	0	7
09:00	2	1	1	0	0	0	0	0	0	4	1	1	0	2	0	0	0	0	0	4
09:15	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	2
09:30	3	0	0	7	0	0	0	0	0	10	4	1	0	1	0	0	0	0	0	6
09:45	3	1	0	3	0	0	0	0	0	7	5	0	0	2	0	0	0	0	0	7
10:00	3	2	0	0	0	0	0	0	0	5	1	1	0	3	0	0	0	0	0	5
10:15	0	1	0	1	0	0	0	0	0	2	3	1	1	3	0	0	0	0	0	8
10:30	3	0	1	1	0	0	0	0	0	5	2	1	0	0	0	0	0	0	0	3
10:45	1	2	0	0	0	0	0	0	0	3	2	1	1	0	0	0	0	0	0	4
11:00	2	1	0	1	1	0	0	0	0	5	1	1	0	1	1	0	0	0	0	4
11:15	1	2	0	0	0	0	0	0	0	3	0	2	0	0	0	0	0	0	0	2
11:30	2	0	0	1	0	0	0	0	0	3	2	1	0	0	0	0	0	0	0	3
11:45	4	0	0	1	0	0	0	0	0	5	2	0	1	1	0	0	0	0	0	4
12:00	1	0	0	1	0	0	0	0	0	2	1	1	0	1	0	0	0	0	0	3
12:15	2	2	0	2	0	0	0	0	0	6	2	0	0	1	0	0	0	0	0	3
12:30	3	0	0	2	0	0	0	1	0	6	2	1	0	1	0	0	0	1	0	5
12:45	5	1	0	1	0	0	0	1	0	8	2	2	0	1	0	0	0	1	0	6
Total	55	24	3	30	1	0	0	4	1	118	52	19	4	29	1	1	0	4	1	111

Time	A										B									
	Car	LGV	OGVI	OGV2	P/C	M/C	PSV	Car U-Turn	LGV U-Turn	Total	Car	LGV	OGVI	OGV2	P/C	M/C	PSV	Car U-Turn	LGV U-Turn	Total
13:00	2	0	0	1	0	0	0	0	1	4	3	0	0	1	0	0	0	0	1	5
13:15	3	1	1	1	0	0	0	1	0	7	1	0	0	3	0	0	0	1	0	5
13:30	3	0	0	1	0	0	0	0	0	4	2	0	1	0	0	0	0	0	0	4
13:45	0	0	0	0	0	0	0	0	1	1	3	0	0	0	0	0	0	0	1	4
14:00	3	1	0	1	0	0	0	1	2	8	4	0	0	2	0	0	0	1	2	9
14:15	0	0	0	1	0	0	0	0	0	1	2	2	0	1	0	0	0	0	0	5
14:30	0	0	0	1	0	0	0	1	0	2	3	0	0	1	0	0	0	1	0	5
14:45	1	0	0	0	0	0	0	0	0	1	2	1	0	1	0	0	0	0	0	4
15:00	1	2	0	2	0	0	0	2	0	7	0	1	0	2	0	0	0	2	0	5
15:15	2	0	0	0	0	0	0	1	0	3	0	1	0	0	0	0	0	1	0	2
15:30	2	0	0	2	0	0	0	0	0	4	1	0	0	1	0	0	0	0	0	2
15:45	1	0	0	1	0	0	0	0	0	2	2	0	0	3	0	0	0	0	0	5
16:00	2	1	0	0	0	0	0	0	0	3	1	0	0	0	0	0	0	0	0	1
16:15	4	0	0	1	0	0	0	1	0	6	0	0	0	0	0	0	0	1	0	1
16:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:45	1	1	0	0	0	0	0	3	0	5	4	2	0	0	0	0	0	3	0	9
17:00	2	0	0	1	0	0	0	1	0	4	3	2	0	1	0	0	0	1	0	7
17:15	2	0	0	0	0	0	0	0	0	2	1	0	0	0	0	0	0	0	0	1
17:30	1	1	0	0	0	0	0	1	0	3	1	0	0	0	0	0	0	1	0	2
17:45	1	0	0	1	0	0	0	1	0	3	4	0	0	0	0	0	0	1	0	5
18:00	7	2	0	0	0	0	0	1	0	10	2	0	0	0	0	0	0	1	0	3
18:15	0	0	0	0	0	0	0	0	0	0	2	1	0	0	0	0	0	0	0	3
18:30	2	0	0	0	0	0	0	0	0	2	1	0	0	0	0	0	0	0	0	1
18:45	1	0	0	0	0	0	0	0	0	1	4	0	0	1	0	0	0	0	0	5
Total	41	9	1	14	0	0	0	14	4	83	46	10	1	18	0	0	0	14	4	93

Total	96	33	4	44	1	0	0	18	5	201	98	29	5	47	1	1	0	18	5	204
--------------	-----------	-----------	----------	-----------	----------	----------	----------	-----------	----------	------------	-----------	-----------	----------	-----------	----------	----------	----------	-----------	----------	------------

Road: Tong End

A: Northbound

Day: Tuesday

B: Southbound

Date: 28 September 2021

Weather: Rain 07:10-11:55 & 13:53-17:18

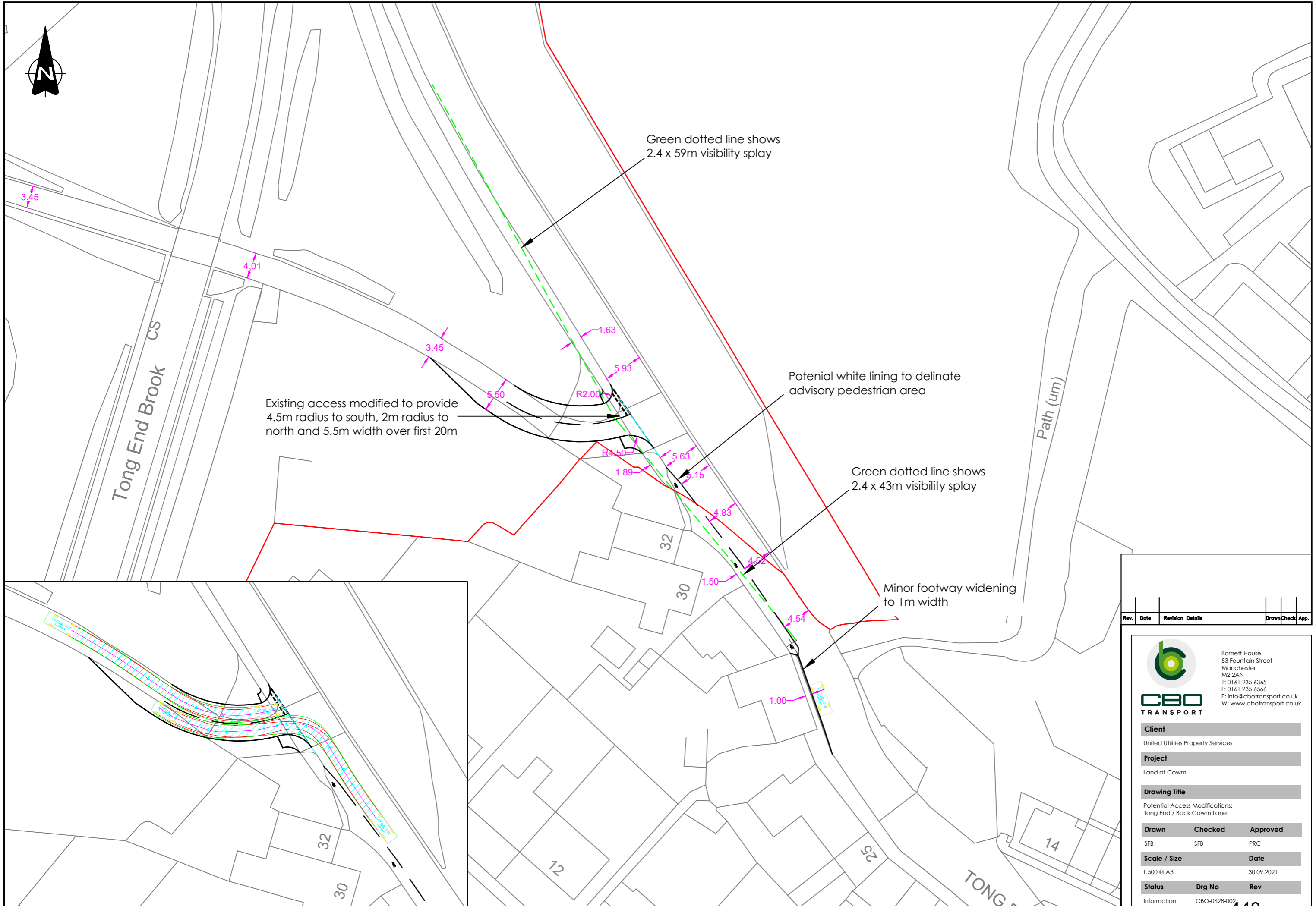
Time	A				B					
	Ad.	Ch.	No of Groups	Tot in groups	Total	Ad.	Ch.	No of Groups	Tot in groups	Total
07:00	1	0	0	0	1	1	0	0	0	1
07:15	1	0	0	0	1	2	0	0	0	2
07:30	3	0	0	0	3	2	1	0	0	3
07:45	1	0	0	0	1	2	0	0	0	2
08:00	1	0	0	0	1	0	0	0	0	0
08:15	0	0	0	0	0	1	0	1	4	5
08:30	2	0	0	0	2	0	0	0	0	0
08:45	0	0	1	2	2	1	0	0	0	1
09:00	0	0	0	0	0	2	0	0	0	2
09:15	1	0	0	0	1	1	0	0	0	1
09:30	1	0	1	2	3	0	0	1	2	2
09:45	1	0	0	0	1	2	0	0	0	2
10:00	0	0	0	0	0	1	0	0	0	1
10:15	0	0	0	0	0	0	0	1	2	2
10:30	0	0	1	2	2	0	0	0	0	0
10:45	0	0	0	0	0	0	0	0	0	0
11:00	0	0	3	6	6	0	0	0	0	0
11:15	1	0	0	0	1	0	0	0	0	0
11:30	1	0	0	0	1	0	0	1	2	2
11:45	3	0	1	4	7	0	0	1	2	2
12:00	2	0	0	0	2	3	0	2	4	7
12:15	2	0	0	0	2	2	0	0	0	2
12:30	1	0	0	0	1	1	0	0	0	1
12:45	0	0	0	0	0	1	0	0	0	1
Total	22	0	7	16	38	22	1	7	16	39

Time	A				B					
	Ad.	Ch.	No of Groups	Tot in groups	Total	Ad.	Ch.	No of Groups	Tot in groups	Total
13:00	4	0	1	2	6	2	0	0	0	2
13:15	2	0	0	0	2	0	0	0	0	0
13:30	0	0	0	0	0	0	0	1	2	2
13:45	1	0	1	2	3	5	0	0	0	5
14:00	1	0	0	0	1	1	0	0	0	1
14:15	0	0	0	0	0	1	0	1	2	3
14:30	1	0	0	0	1	1	0	0	0	1
14:45	2	0	0	0	2	0	0	0	0	0
15:00	0	0	0	0	0	2	0	0	0	2
15:15	1	0	0	0	1	2	0	0	0	2
15:30	0	0	0	0	0	1	0	0	0	1
15:45	0	0	0	0	0	0	0	1	4	4
16:00	0	0	0	0	0	0	0	0	0	0
16:15	0	0	0	0	0	0	0	0	0	0
16:30	0	0	0	0	0	0	0	0	0	0
16:45	0	0	0	0	0	0	0	0	0	0
17:00	0	0	1	4	4	0	0	0	0	0
17:15	4	0	2	4	8	1	0	0	0	1
17:30	0	0	0	0	0	1	0	1	2	3
17:45	2	0	0	0	2	2	0	1	2	4
18:00	1	0	0	0	1	1	0	0	0	1
18:15	3	0	0	0	3	2	0	0	0	2
18:30	0	0	0	0	0	1	0	0	0	1
18:45	3	0	0	0	3	2	0	0	0	2
Total	25	0	5	12	37	25	0	5	12	37

Total	47	0	12	28	75	47	1	12	28	76
--------------	-----------	----------	-----------	-----------	-----------	-----------	----------	-----------	-----------	-----------



Appendix B: Potential Access Drawing



Green dotted line shows 2.4 x 59m visibility splay

Existing access modified to provide 4.5m radius to south, 2m radius to north and 5.5m width over first 20m

Potential white lining to delineate advisory pedestrian area

Green dotted line shows 2.4 x 43m visibility splay

Minor footway widening to 1m width

Rev.	Date	Revision Details	Drawn	Checked	App.

 Barnett House
53 Fountain Street
Manchester
M2 2AN
T: 0161 235 6365
F: 0161 235 6566
E: info@cbotransport.co.uk
W: www.cbotransport.co.uk

Client		
United Utilities Property Services		
Project		
Land at Cowm		
Drawing Title		
Potential Access Modifications: Tong End / Back Cowm Lane		
Drawn	Checked	Approved
SFB	SFB	PRC
Scale / Size		Date
1:500 @ A3		30.09.2021
Status	Drg No	Rev
Information	CBO-0628-002	



Appendix C: TRICS Output

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL VEHICLESSelected regions and areas:

02	SOUTH EAST	
	KC KENT	1 days
03	SOUTH WEST	
	WL WILTSHIRE	1 days
04	EAST ANGLIA	
	CA CAMBRIDGESHIRE	1 days
	NF NORFOLK	1 days
	SF SUFFOLK	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	3 days
08	NORTH WEST	
	CH CHESHIRE	2 days
	MS MERSEYSIDE	1 days
09	NORTH	
	TW TYNE & WEAR	1 days
10	WALES	
	VG VALE OF GLAMORGAN	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 8 to 28 (units:)
 Range Selected by User: 6 to 30 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/13 to 08/06/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	5 days
Wednesday	4 days
Thursday	2 days
Friday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	13 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	7
Edge of Town	5
Neighbourhood Centre (PPS6 Local Centre)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 13 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,001 to 5,000	2 days
5,001 to 10,000	2 days
10,001 to 15,000	4 days
15,001 to 20,000	2 days
20,001 to 25,000	1 days
25,001 to 50,000	2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
25,001 to 50,000	1 days
50,001 to 75,000	3 days
75,001 to 100,000	1 days
125,001 to 250,000	5 days
250,001 to 500,000	2 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	6 days
1.1 to 1.5	6 days
1.6 to 2.0	1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	1 days
No	12 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	13 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	CA-03-A-05	DETACHED HOUSES	CAMBRIDGESHIRE
	EASTFIELD ROAD PETERBOROUGH		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total No of Dwellings:	28	
	Survey date: MONDAY	17/10/16	Survey Type: MANUAL
2	CH-03-A-09	TERRACED HOUSES	CHESHIRE
	GREYSTOKE ROAD MACCLESFIELD HURDSFIELD		
	Edge of Town Residential Zone		
	Total No of Dwellings:	24	
	Survey date: MONDAY	24/11/14	Survey Type: MANUAL
3	CH-03-A-11	TOWN HOUSES	CHESHIRE
	LONDON ROAD NORTHWICH LEFTWICH		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total No of Dwellings:	24	
	Survey date: THURSDAY	06/06/19	Survey Type: MANUAL
4	KC-03-A-05	DETACHED & SEMI-DETACHED	KENT
	ROCHESTER ROAD NEAR CHATHAM BURHAM		
	Neighbourhood Centre (PPS6 Local Centre) Village		
	Total No of Dwellings:	8	
	Survey date: FRIDAY	22/09/17	Survey Type: MANUAL
5	MS-03-A-03	DETACHED	MERSEYSIDE
	BEMPTON ROAD LIVERPOOL OTTERSPOOL		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total No of Dwellings:	15	
	Survey date: FRIDAY	21/06/13	Survey Type: MANUAL
6	NF-03-A-03	DETACHED HOUSES	NORFOLK
	HALING WAY THETFORD		
	Edge of Town Residential Zone		
	Total No of Dwellings:	10	
	Survey date: WEDNESDAY	16/09/15	Survey Type: MANUAL
7	NY-03-A-08	TERRACED HOUSES	NORTH YORKSHIRE
	NICHOLAS STREET YORK		
	Suburban Area (PPS6 Out of Centre) Residential Zone		
	Total No of Dwellings:	21	
	Survey date: MONDAY	16/09/13	Survey Type: MANUAL
8	NY-03-A-11	PRIVATE HOUSING	NORTH YORKSHIRE
	HORSEFAIR BOROUGHBRIDGE		
	Edge of Town Residential Zone		
	Total No of Dwellings:	23	
	Survey date: WEDNESDAY	18/09/13	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

<p>9 NY-03-A-13 TERRACED HOUSES CATTERICK ROAD CATTERICK GARRISON OLD HOSPITAL COMPOUND Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 10 Survey date: WEDNESDAY 10/05/17</p>	<p>NORTH YORKSHIRE</p> <p>Survey Type: MANUAL</p>
<p>10 SF-03-A-05 DETACHED HOUSES VALE LANE BURY ST EDMUNDS</p> <p>Edge of Town Residential Zone Total No of Dwellings: 18 Survey date: WEDNESDAY 09/09/15</p>	<p>SUFFOLK</p> <p>Survey Type: MANUAL</p>
<p>11 TW-03-A-02 SEMI-DETACHED WEST PARK ROAD GATESHEAD</p> <p>Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 16 Survey date: MONDAY 07/10/13</p>	<p>TYNE & WEAR</p> <p>Survey Type: MANUAL</p>
<p>12 VG-03-A-01 SEMI-DETACHED & TERRACED ARTHUR STREET BARRY</p> <p>Edge of Town Residential Zone Total No of Dwellings: 12 Survey date: MONDAY 08/05/17</p>	<p>VALE OF GLAMORGAN</p> <p>Survey Type: MANUAL</p>
<p>13 WL-03-A-02 SEMI DETACHED HEADLANDS GROVE SWINDON</p> <p>Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings: 27 Survey date: THURSDAY 22/09/16</p>	<p>WILTSHIRE</p> <p>Survey Type: MANUAL</p>

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
DC-03-A-08	Bungalows
HF-03-A-04	Covid
PS-03-A-02	Bungalows
SH-03-A-06	Bungalows
WK-03-A-02	Bungalows

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.106	13	18	0.305	13	18	0.411
08:00 - 09:00	13	18	0.191	13	18	0.470	13	18	0.661
09:00 - 10:00	13	18	0.153	13	18	0.178	13	18	0.331
10:00 - 11:00	13	18	0.165	13	18	0.153	13	18	0.318
11:00 - 12:00	13	18	0.178	13	18	0.186	13	18	0.364
12:00 - 13:00	13	18	0.212	13	18	0.229	13	18	0.441
13:00 - 14:00	13	18	0.199	13	18	0.199	13	18	0.398
14:00 - 15:00	13	18	0.199	13	18	0.203	13	18	0.402
15:00 - 16:00	13	18	0.322	13	18	0.284	13	18	0.606
16:00 - 17:00	13	18	0.288	13	18	0.220	13	18	0.508
17:00 - 18:00	13	18	0.356	13	18	0.174	13	18	0.530
18:00 - 19:00	13	18	0.292	13	18	0.195	13	18	0.487
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.661			2.796			5.457

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

The survey data, graphs and all associated supporting information, contained within the TRICS Database are published by TRICS Consortium Limited ("the Company") and the Company claims copyright and database rights in this published work. The Company authorises those who possess a current TRICS licence to access the TRICS Database and copy the data contained within the TRICS Database for the licence holders' use only. Any resulting copy must retain all copyrights and other proprietary notices, and any disclaimer contained thereon.

The Company accepts no responsibility for loss which may arise from reliance on data contained in the TRICS Database. [No warranty of any kind, express or implied, is made as to the data contained in the TRICS Database.]

Parameter summary

Trip rate parameter range selected: 8 - 28 (units:)
 Survey date range: 01/01/13 - 08/06/21
 Number of weekdays (Monday-Friday): 13
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 5

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TAXIS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.000	13	18	0.000	13	18	0.000
08:00 - 09:00	13	18	0.013	13	18	0.013	13	18	0.026
09:00 - 10:00	13	18	0.000	13	18	0.000	13	18	0.000
10:00 - 11:00	13	18	0.004	13	18	0.004	13	18	0.008
11:00 - 12:00	13	18	0.004	13	18	0.004	13	18	0.008
12:00 - 13:00	13	18	0.004	13	18	0.000	13	18	0.004
13:00 - 14:00	13	18	0.008	13	18	0.013	13	18	0.021
14:00 - 15:00	13	18	0.004	13	18	0.000	13	18	0.004
15:00 - 16:00	13	18	0.004	13	18	0.008	13	18	0.012
16:00 - 17:00	13	18	0.000	13	18	0.000	13	18	0.000
17:00 - 18:00	13	18	0.000	13	18	0.000	13	18	0.000
18:00 - 19:00	13	18	0.008	13	18	0.008	13	18	0.016
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.049			0.050			0.099

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL OGVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.000	13	18	0.000	13	18	0.000
08:00 - 09:00	13	18	0.008	13	18	0.008	13	18	0.016
09:00 - 10:00	13	18	0.004	13	18	0.004	13	18	0.008
10:00 - 11:00	13	18	0.008	13	18	0.004	13	18	0.012
11:00 - 12:00	13	18	0.000	13	18	0.004	13	18	0.004
12:00 - 13:00	13	18	0.000	13	18	0.000	13	18	0.000
13:00 - 14:00	13	18	0.004	13	18	0.004	13	18	0.008
14:00 - 15:00	13	18	0.000	13	18	0.000	13	18	0.000
15:00 - 16:00	13	18	0.000	13	18	0.000	13	18	0.000
16:00 - 17:00	13	18	0.000	13	18	0.000	13	18	0.000
17:00 - 18:00	13	18	0.004	13	18	0.004	13	18	0.008
18:00 - 19:00	13	18	0.000	13	18	0.000	13	18	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.028			0.028			0.056

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PSVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.000	13	18	0.000	13	18	0.000
08:00 - 09:00	13	18	0.008	13	18	0.008	13	18	0.016
09:00 - 10:00	13	18	0.000	13	18	0.000	13	18	0.000
10:00 - 11:00	13	18	0.000	13	18	0.000	13	18	0.000
11:00 - 12:00	13	18	0.000	13	18	0.000	13	18	0.000
12:00 - 13:00	13	18	0.000	13	18	0.000	13	18	0.000
13:00 - 14:00	13	18	0.000	13	18	0.000	13	18	0.000
14:00 - 15:00	13	18	0.000	13	18	0.000	13	18	0.000
15:00 - 16:00	13	18	0.008	13	18	0.008	13	18	0.016
16:00 - 17:00	13	18	0.000	13	18	0.000	13	18	0.000
17:00 - 18:00	13	18	0.000	13	18	0.000	13	18	0.000
18:00 - 19:00	13	18	0.000	13	18	0.000	13	18	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.016			0.016			0.032

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL CYCLISTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.017	13	18	0.042	13	18	0.059
08:00 - 09:00	13	18	0.000	13	18	0.042	13	18	0.042
09:00 - 10:00	13	18	0.004	13	18	0.008	13	18	0.012
10:00 - 11:00	13	18	0.000	13	18	0.008	13	18	0.008
11:00 - 12:00	13	18	0.000	13	18	0.008	13	18	0.008
12:00 - 13:00	13	18	0.021	13	18	0.008	13	18	0.029
13:00 - 14:00	13	18	0.013	13	18	0.004	13	18	0.017
14:00 - 15:00	13	18	0.004	13	18	0.008	13	18	0.012
15:00 - 16:00	13	18	0.034	13	18	0.000	13	18	0.034
16:00 - 17:00	13	18	0.034	13	18	0.004	13	18	0.038
17:00 - 18:00	13	18	0.021	13	18	0.017	13	18	0.038
18:00 - 19:00	13	18	0.013	13	18	0.000	13	18	0.013
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.161			0.149			0.310

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL VEHICLE OCCUPANTSCalculation factor: **1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.136	13	18	0.398	13	18	0.534
08:00 - 09:00	13	18	0.208	13	18	0.691	13	18	0.899
09:00 - 10:00	13	18	0.165	13	18	0.229	13	18	0.394
10:00 - 11:00	13	18	0.203	13	18	0.216	13	18	0.419
11:00 - 12:00	13	18	0.220	13	18	0.225	13	18	0.445
12:00 - 13:00	13	18	0.254	13	18	0.288	13	18	0.542
13:00 - 14:00	13	18	0.229	13	18	0.242	13	18	0.471
14:00 - 15:00	13	18	0.258	13	18	0.242	13	18	0.500
15:00 - 16:00	13	18	0.487	13	18	0.352	13	18	0.839
16:00 - 17:00	13	18	0.415	13	18	0.292	13	18	0.707
17:00 - 18:00	13	18	0.513	13	18	0.250	13	18	0.763
18:00 - 19:00	13	18	0.403	13	18	0.246	13	18	0.649
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.491			3.671			7.162

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PEDESTRIANS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.034	13	18	0.081	13	18	0.115
08:00 - 09:00	13	18	0.097	13	18	0.157	13	18	0.254
09:00 - 10:00	13	18	0.038	13	18	0.068	13	18	0.106
10:00 - 11:00	13	18	0.068	13	18	0.089	13	18	0.157
11:00 - 12:00	13	18	0.055	13	18	0.059	13	18	0.114
12:00 - 13:00	13	18	0.064	13	18	0.068	13	18	0.132
13:00 - 14:00	13	18	0.072	13	18	0.085	13	18	0.157
14:00 - 15:00	13	18	0.089	13	18	0.064	13	18	0.153
15:00 - 16:00	13	18	0.148	13	18	0.136	13	18	0.284
16:00 - 17:00	13	18	0.127	13	18	0.072	13	18	0.199
17:00 - 18:00	13	18	0.110	13	18	0.089	13	18	0.199
18:00 - 19:00	13	18	0.089	13	18	0.059	13	18	0.148
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.991			1.027			2.018

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL BUS/TRAM PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.017	13	18	0.013	13	18	0.030
08:00 - 09:00	13	18	0.008	13	18	0.030	13	18	0.038
09:00 - 10:00	13	18	0.000	13	18	0.013	13	18	0.013
10:00 - 11:00	13	18	0.017	13	18	0.013	13	18	0.030
11:00 - 12:00	13	18	0.004	13	18	0.008	13	18	0.012
12:00 - 13:00	13	18	0.021	13	18	0.017	13	18	0.038
13:00 - 14:00	13	18	0.004	13	18	0.000	13	18	0.004
14:00 - 15:00	13	18	0.000	13	18	0.004	13	18	0.004
15:00 - 16:00	13	18	0.004	13	18	0.008	13	18	0.012
16:00 - 17:00	13	18	0.025	13	18	0.004	13	18	0.029
17:00 - 18:00	13	18	0.021	13	18	0.017	13	18	0.038
18:00 - 19:00	13	18	0.013	13	18	0.004	13	18	0.017
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.134			0.131			0.265

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL COACH PASSENGERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.000	13	18	0.000	13	18	0.000
08:00 - 09:00	13	18	0.000	13	18	0.008	13	18	0.008
09:00 - 10:00	13	18	0.000	13	18	0.000	13	18	0.000
10:00 - 11:00	13	18	0.000	13	18	0.000	13	18	0.000
11:00 - 12:00	13	18	0.000	13	18	0.000	13	18	0.000
12:00 - 13:00	13	18	0.000	13	18	0.000	13	18	0.000
13:00 - 14:00	13	18	0.000	13	18	0.000	13	18	0.000
14:00 - 15:00	13	18	0.000	13	18	0.000	13	18	0.000
15:00 - 16:00	13	18	0.008	13	18	0.000	13	18	0.008
16:00 - 17:00	13	18	0.000	13	18	0.000	13	18	0.000
17:00 - 18:00	13	18	0.000	13	18	0.000	13	18	0.000
18:00 - 19:00	13	18	0.000	13	18	0.000	13	18	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.008			0.008			0.016

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL PUBLIC TRANSPORT USERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.017	13	18	0.013	13	18	0.030
08:00 - 09:00	13	18	0.008	13	18	0.038	13	18	0.046
09:00 - 10:00	13	18	0.000	13	18	0.013	13	18	0.013
10:00 - 11:00	13	18	0.017	13	18	0.013	13	18	0.030
11:00 - 12:00	13	18	0.004	13	18	0.008	13	18	0.012
12:00 - 13:00	13	18	0.021	13	18	0.017	13	18	0.038
13:00 - 14:00	13	18	0.004	13	18	0.000	13	18	0.004
14:00 - 15:00	13	18	0.000	13	18	0.004	13	18	0.004
15:00 - 16:00	13	18	0.013	13	18	0.008	13	18	0.021
16:00 - 17:00	13	18	0.025	13	18	0.004	13	18	0.029
17:00 - 18:00	13	18	0.021	13	18	0.017	13	18	0.038
18:00 - 19:00	13	18	0.013	13	18	0.004	13	18	0.017
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.143			0.139			0.282

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL PEOPLE**Calculation factor: 1 DWELLS****BOLD print indicates peak (busiest) period**

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.203	13	18	0.534	13	18	0.737
08:00 - 09:00	13	18	0.314	13	18	0.928	13	18	1.242
09:00 - 10:00	13	18	0.208	13	18	0.318	13	18	0.526
10:00 - 11:00	13	18	0.288	13	18	0.326	13	18	0.614
11:00 - 12:00	13	18	0.280	13	18	0.301	13	18	0.581
12:00 - 13:00	13	18	0.360	13	18	0.381	13	18	0.741
13:00 - 14:00	13	18	0.318	13	18	0.331	13	18	0.649
14:00 - 15:00	13	18	0.352	13	18	0.318	13	18	0.670
15:00 - 16:00	13	18	0.682	13	18	0.496	13	18	1.178
16:00 - 17:00	13	18	0.602	13	18	0.373	13	18	0.975
17:00 - 18:00	13	18	0.665	13	18	0.373	13	18	1.038
18:00 - 19:00	13	18	0.517	13	18	0.309	13	18	0.826
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			4.789			4.988			9.777

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL CARS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.093	13	18	0.280	13	18	0.373
08:00 - 09:00	13	18	0.123	13	18	0.403	13	18	0.526
09:00 - 10:00	13	18	0.123	13	18	0.144	13	18	0.267
10:00 - 11:00	13	18	0.123	13	18	0.127	13	18	0.250
11:00 - 12:00	13	18	0.157	13	18	0.165	13	18	0.322
12:00 - 13:00	13	18	0.182	13	18	0.191	13	18	0.373
13:00 - 14:00	13	18	0.148	13	18	0.144	13	18	0.292
14:00 - 15:00	13	18	0.178	13	18	0.182	13	18	0.360
15:00 - 16:00	13	18	0.271	13	18	0.229	13	18	0.500
16:00 - 17:00	13	18	0.267	13	18	0.199	13	18	0.466
17:00 - 18:00	13	18	0.326	13	18	0.165	13	18	0.491
18:00 - 19:00	13	18	0.267	13	18	0.182	13	18	0.449
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.258			2.411			4.669

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL LGVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.013	13	18	0.025	13	18	0.038
08:00 - 09:00	13	18	0.038	13	18	0.038	13	18	0.076
09:00 - 10:00	13	18	0.025	13	18	0.030	13	18	0.055
10:00 - 11:00	13	18	0.030	13	18	0.017	13	18	0.047
11:00 - 12:00	13	18	0.017	13	18	0.013	13	18	0.030
12:00 - 13:00	13	18	0.025	13	18	0.038	13	18	0.063
13:00 - 14:00	13	18	0.038	13	18	0.038	13	18	0.076
14:00 - 15:00	13	18	0.017	13	18	0.017	13	18	0.034
15:00 - 16:00	13	18	0.038	13	18	0.038	13	18	0.076
16:00 - 17:00	13	18	0.021	13	18	0.021	13	18	0.042
17:00 - 18:00	13	18	0.021	13	18	0.008	13	18	0.029
18:00 - 19:00	13	18	0.017	13	18	0.000	13	18	0.017
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.300			0.283			0.583

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

MULTI-MODAL MOTOR CYCLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	13	18	0.000	13	18	0.000	13	18	0.000
08:00 - 09:00	13	18	0.000	13	18	0.000	13	18	0.000
09:00 - 10:00	13	18	0.000	13	18	0.000	13	18	0.000
10:00 - 11:00	13	18	0.000	13	18	0.000	13	18	0.000
11:00 - 12:00	13	18	0.000	13	18	0.000	13	18	0.000
12:00 - 13:00	13	18	0.000	13	18	0.000	13	18	0.000
13:00 - 14:00	13	18	0.000	13	18	0.000	13	18	0.000
14:00 - 15:00	13	18	0.000	13	18	0.004	13	18	0.004
15:00 - 16:00	13	18	0.000	13	18	0.000	13	18	0.000
16:00 - 17:00	13	18	0.000	13	18	0.000	13	18	0.000
17:00 - 18:00	13	18	0.004	13	18	0.000	13	18	0.004
18:00 - 19:00	13	18	0.000	13	18	0.000	13	18	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.004			0.004			0.008

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

Appendix 3 – LCC Highways formal response dated 13 October 2021

Steve Bowers
Steve@cbotransport.co.uk

██████████
██████████

████████████████████
██

Ref No: Pre-app Cowm WTW
Officer: Kelly Holt

Date: 13th October 2021

PRE-APPLICATION ADVICE

Location

Land at Cowm Water Treatment Works, Tong End, Whitworth

Description of proposals

Erection of 10 dwellings

Comments

The comments are given in response to the documents named:-

- CBO-628-002 - Access Appraisal including traffic/pedestrian survey data, access modifications Tong Lane/Back Cowm Lane drawing and TRICs output.

Local Plan

The Highway Authority had originally raised concerns to Rossendale Borough Council about this site (H69) being allocated for up to 20 units in the Local Plan due to the constraints on Tong End itself and the site access arrangements.

The Inspector has subsequently asked for this site to be removed from the plan. Rossendale BC have suggested that pre-application highway advice is sought for this site and presented before 15th October 2021 when the consultation period closes.

The access appraisal submitted with this pre-application presents evidence to support 10 dwellings on the site which is a reduction from the original proposal of 20.

Sustainability

The nearest bus stops are approx. 700m away on Market Street which are served by mainline service 464 (Accrington-Rochdale) Mon-Sun at regular intervals throughout the day. Quality bus stops are in-situ together with a zebra crossing on Market Street immediately south of Tong End provides adequate pedestrian facility to access the southbound stop.

Cowm Park Way is a designated cycle way which is approx. 400m from the site.

Phil Barrett

Director of Community Services
Cuerden Way • Bamber Bridge • Preston • PR5 6BS

The site is located within walking distance of the mainline bus stops and designated cycle way and together with secure, covered cycle storage and EV charging provision for every dwelling, it is considered to support sustainable travel.

Traffic Impact

A 12 hour 7am-7pm traffic survey is submitted on Tong End on Tuesday 28th September 2021. The survey records a daily flow of circa 500 vehicles which includes 100 HGV's accessing the quarry.

Site observations have been carried out on Wednesday 29th September 2021 which establish the informal on-street parking arrangements which seek to advise the impact of the pedestrian improvement scheme. It is noted that conflict with the quarry wagons and opposing vehicles is minimal due to the low flows and opportunities for vehicles to give and take where there is no on-street parking.

The am peak hour records 51 2-way trips and the pm peak 30 2-way trips. The development traffic increases this to 59 vehicle trips in the am peak and 36 vehicle trips in the pm peak.

Pedestrians were counted during the same period 11 trips during the am peak and 22 in the pm, the increases to 14 and 24 with the development traffic.

Tong End is unclassified with a 20mph speed limit and Back Cowm Lane has a 30mph speed limit. Parking occurs on the west side and there is a footway along the west side which varies in width.

There are no collisions reported on Tong End in the previous 5 years.

The impact on the wider network is considered acceptable subject to the off-site highway works detailed below.

Off-site highway works

Drawing CBO-0628-002 includes a pedestrian walkway and footway widening adjacent to 27 Tong End. This scheme is considered suitable to mitigate the impact of the development traffic on Tong Lane.

The highway works will be delivered under a S278 agreement with Lancashire County Council.

Site access

Drawing CBO-0628-002 at Appendix B shows the existing access being modified to provide a 4.5 metre radius to the south, a 2-metre radius to the north and the access widened to 5.5 metres over the first 20 metres.

Tracking for 2 cars to pass side by side is included.

Splays of 2.4 x 59 metre to the north and 2.4 x 43 metre splay to the south are shown on the drawing. There are no speeds recorded and we have no data on our system, I do not dispute that 85thile speeds would be higher than 30mph therefore I

would consider the splays acceptable. They can be achieved within the applicant's land or the adopted highway.

The site access arrangement is considered suitable to accommodate the development traffic.

Internal layout

There is no internal layout submitted. The drawing CBO-0628-002 shows existing carriageway widths which vary between 3.45m and 4.01m. The internal road layout must be designed to Manual for Streets. Short sections can be single vehicle working however localised widening will be required to a minimum of 4.8m to allow a car and wagon to pass. Tracking for the refuse vehicle should be provided for the whole layout and inter visibility for opposing flows should be demonstrated to minimise conflict which would result in drivers reversing or overrunning the verges.

Roads

The existing carriageways should be made up to adoptable standard including suitable carriageway construction (trial holes in the existing to determine the existing specification), kerbed edge, street lighting scheme and surface water drainage provision.

LCC would seek to adopt internal estate roads which serve more than 5 dwellings. If the applicant chooses to have the estate roads privately maintained, then a private management company should be established and the details of this will be requested by condition at a later date.

Bridges

The two existing vehicle bridges, which provide sole access to the site, which span the reservoir spillways will need to be assessed and upgraded/re-built if necessary to ensure they are suitable for all vehicles (construction vehicles, refuse vehicle/fire tender).

A Principal Bridge Inspection for Assessment be undertaken in accordance with CG450 DMRB, inspection for assessment (Special Inspection) as well as a structural assessment in accordance with CS454 in conjunction with technical approval process set out in CG300 DMRB to determine the capacity of the bridge. Any repairs or strengthening measures that are required should be undertaken prior to commencement of any development.

The bridge parapets appear unsuitable to restrain vehicles and to prevent pedestrians falling. Significant improvement appears necessary to bring the bridges to an adoptable standard.

We would reserve the right to refuse to adopt these assets due to the high burden which it would place in the Highway Authority. We would require further time to consider this. I anticipate that we can deal with this matter at a later date.

Refuse

The internal layout will need to be designed to allow a refuse vehicle to enter and exit on Tong End in forward gear. A suitable sized turning head should be provided to LCC specification or a swept path for the largest refuse vehicle provided.

Residents should not be required to move their waste more than 30m to the collection point.

Parking

In accordance with the parking standards 1 bedroom dwellings = 1 space and 2 and 3 bedroom properties = 2 spaces, 4+ bedroom = 3 spaces. Each dwelling should have an electric vehicle charging point and a secure, covered cycle store. If a garage is provided it should measure 3x6m internally to count as a parking space/cycle store.

Advice

1. Consider reducing by 1 dwelling to fall into the minor application category.

Conclusion

The development traffic from the proposed 10 dwellings can be mitigated with the pedestrian improvements on Tong Lane and site access widening. Additional measures are required internally to provide infrastructure in accordance with the Manual for Streets and to adoptable standards. Subject to the mitigation and an internal layout which satisfies the Highway Authority, there is no objection to a development of up to 10 dwellings.

Note

The Council's advice is current on the date it is given. Whilst every attempt will be made to identify reasonably foreseeable future influences the Council cannot guarantee that its advice will take these into account. This may extend to matters such as changes in planning policy or planning precedent. The advice in any event will expire 12 months after the date on which it is given.

Kelly Holt
Highway Development Support
Community Services
Lancashire County Council

Sent from my iPad. Good morning my name is Mrs Christine hereward 1308 Burnley road loveclough bb48rg. I will be objecting to the proposed house building on land in front of swinshaw hall . I object on the grounds that we do not have the capacity for schools doctors dentists and just as important the extra traffic it will bring to Burnley road. Your faithfully . Mrs Christine hereward .

Flood Risk Management Team
Lancashire County Council
PO Box 78 County Hall
Preston
Lancashire
PR1 8XJ

Contact: highways@lancashire.gov.uk

Date: 15 October 2021

Dear Rossendale Local Planning Authority,

ROSSENDALE LOCAL PLAN CONSULTATION RESPONSE

Thank you for inviting Lancashire County Council's Flood Risk Management Team to comment on the proposed modifications to Rossendale's Local Plan. Lancashire County Council is the Lead Local Flood Authority (LLFA) for the County Council's administrative area. The Flood and Water Management Act (FWMA) sets out the requirement for the LLFA to manage 'local' flood risk (flooding from surface water, groundwater, and ordinary watercourses) within their area.

The Lead Local Flood Authority have reviewed the consultation documents (EL12.001 to EL12.010) and have added tracked changes and comments to the schedule of proposed main modifications PDF (attached). These comments are summarised in this letter.

MM040 – Policy ENV1: High Quality Development in the Borough

1. Point I should be changed to "That proposals do not increase the risk of flooding on the site or elsewhere and seek *to eliminate or reduce* the risk of flooding overall, having have regard to the surface water drainage hierarchy and the *DEFRA Technical Standards for SuDS*."

MM044 – Policy ENV5: Green Infrastructure Networks

1. This policy is titled and refers to "Green Infrastructure", however, the borough council is striving to use green spaces as part of the SuDS approach. Therefore, references to "green infrastructure" should be replaced with "Blue-green infrastructure (BGI)" throughout the policy, so that developments consider these interconnected systems appropriately, providing multiple benefits, in line with policy ENV9.
2. Reference sustainable drainage systems within the policy. SuDS are a critical blue-green infrastructure component and should be considered by developers in this regard.

MM048 – Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality

The LLFA generally agrees with this policy and is pleased to see priority being given to multi-functional sustainable drainage systems. However, further improvements can be made to bring the policy in line with national requirements, the expectations of the LLFA, and to provide continuity with other environmental policies within the Local Plan. This seeks to provide sustainable development within the borough, providing multiple benefits while addressing flood risk. These improvements are set out as follows:

1. "All development proposals will be required to consider and *eliminate or reduce* flood risk from *all sources*", in line with our proposed change to MM040, and national guidance.
2. The strategic flood risk assessment (SFRA) should be referenced before the Environment Agency, Lead Local Flood Authority and the water and sewage undertaker, as the SFRA should be considered first by developers. The sewerage undertaker should be named appropriately as the water and sewerage undertaker in line with the design and construction guidance (DCG). The highways authority should also be added.
3. Flood risk assessments should be referenced appropriately as *site specific* flood risk assessments, and a reference to flood zone 1 should be added where indicated for clarity.
4. A paragraph should be added regarding watercourses and development. It should be stated that development adjacent to a water body actively seeks to enhance the water body in terms of its hydro morphology, biodiversity potential and setting. It should be stated that watercourses should not be culverted and any opportunity to remove culverts is taken. It should be stated that no development (including walls or fences) should occur within 8 m of any culverted or open watercourses. This is in line with the EA and LLFAs positions and will ensure appropriate access for future maintenance is maintained, for example, removing debris to reduce flood risk.
5. Where "All development proposals" are referenced, add ", including change of use" for clarity.
6. Regarding the surface water drainage hierarchy, lines should be added to the top of the hierarchy to ensure rainfall is considered as a resource and source control is used. It should be made clear that a combination of measures from the hierarchy can be used, where appropriate. Point 1 of the hierarchy should be changed to "into the ground (infiltration)" in line with the planning practice guidance. Additionally, suggesting soakaways should be prioritised contradicts the remainder of the policy, as soakaways do not provide multiple benefits. Instead, infiltration features such as detention basins should be prioritised, which provide improvements for water quality, amenity, and biodiversity. The SuDS approach to managing surface water runoff from the CIRIA SuDS Manual C753 (2015) is suggested to address these points, and is as follows:
 - *Use surface water runoff as a resource*
 - *Manage rainwater close to where it falls at source*

- *Manage runoff on the surface above ground*
- *Allow rainwater to soak into the ground (infiltration)*
- *Promote evapotranspiration*
- *Slow and store runoff to mimic natural runoff rates and volumes*
- *Reduce contamination of runoff through pollution prevention and controlling the runoff at source*
- *Treat runoff to reduce the risk of urban contaminants causing environmental pollution*

Depending on the characteristics of the site and local requirements, these may be used in combination and to varying degrees.

7. A line should be added stating that appropriate allowances for climate change (40%) and urban creep (10%) should be included within drainage design. Urban creep is the change of permeable to impermeable areas over time, such as driveway extensions, and can result in increased flood risk. This is in line with the LLFAs position and national guidance.
8. Where "sustainable drainage systems" are referenced, this should be changed to "multi-functional sustainable drainage systems" throughout the policy, in line with the policies expectations.
9. The sentence "Applicants will need to consider what contribution landscaping proposals (hard and soft) can make to reducing surface water discharge" should be removed. This is contradictory to the previous statement that surface water management must be considered early in the design process, suggesting that landscaping is more important. We believe the intention of this statement is to refer to areas of open space, outside of the drainage system. The policy should, therefore, state "Applicants will need to consider how surface water can be managed within non-drained and public open space areas".
10. "underground tanked storage systems" should be changed to "conventional underground systems" for clarity.
11. Regarding multifunctional SuDS, it should be made clear that these contribute to *improved* amenity, biodiversity, and water quality, as well as climate change *adaptation*. A line should be added referring to appropriate water quality guidance to show how improvements in water quality can be made.
12. Alternatives to multi-functional SuDS should only be permitted in exceptional circumstances, and multi-functional SuDS *must* be considered by applicants.
13. "Sustainable drainage features" should be changed to "sustainable drainage components" throughout, in line with the DCG.
14. A line should be added to the policy which makes it clear that all major development proposals should be supported by a minimum level of information required by the Lead Local Flood Authority (and other consultees where appropriate) to support the development of multi-functional SuDS. This can be facilitated through referencing the north west SuDS pro-forma within the policy, which encourages the uptake of multi-functional SuDS. The pro-forma also ensures the LLFA have all the evidence required from the developer to fully assess their proposals and minimises instances where the LLFA does not have

enough information to reach a substantive response when reviewing applications. Rossendale Borough Council are also strongly advised to add the SuDS pro-forma to the validation checklist at the earliest possible opportunity and are strongly advised to add it to their website as advice in the meantime.

SuDS Pro-forma: <https://www.lancashire.gov.uk/media/919088/nw-suds-pro-forma.docx>

SuDS Pro-forma guidance: <https://www.lancashire.gov.uk/media/919089/nw-suds-pro-forma-guidance.pdf>

15. The management and maintenance paragraph should be expanded, making it clear that *phasing*, implementation, management, and maintenance arrangements for the *lifetime of the development* should be made. This should include references to construction and demolition phases, as we are aware of circumstances where the development has flooded during construction due to a lack of consideration for a construction phase management plan in which surface water is managed during this time.

This paragraph should also include lines to:

- a. Include the arrangements for adoption of SuDS by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime, in line with paragraph 169 of the NPPF.
 - b. Ensure sufficient access for future maintenance of any SuDS features and/or open or culverted watercourses, including ensuring sufficient access to any off-site land used for SuDS or discharge points, either through direct ownership or legal agreement, in line with paragraph 169 of the NPPF.
 - c. Identify who would be responsible for future maintenance of any SuDS features and/or open or culverted watercourses upon completion of the development, in line with paragraph 169 of the NPPF.
16. A line should be added which makes it clear that overland flood routes / flood water exceedance routes must be managed in a way that reduces risk to people and property, working with the natural topography of the site, in line with standard S9 of the DEFRA technical standards for SuDS.
17. Further minor changes are indicated within the attached PDF.

PM-09

1. The LLFA wish to note that most of the proposed allocation includes areas at high risk of surface water flooding.

I hope that you find these comments valuable. Should you wish for further information or clarification to the contents of this letter please contact us on the email address provided.

Yours faithfully,

Phil Wadley

Lead Local Flood Authority

14.10.21

Ref MM009 H3 Swinshaw Hal. (previously EL8.009.1 Land site H5 objection to inclusion in the local plan.

I am writing to object to the inclusion of MM009 H3 Swishaw Hall in the Rossendale Local Plan (2019-2036).

General Comments

I believe that many of the key documents needed to ensure that this land is suitable to be included in the Rossendale Local Plan are missing.

These include:

- Detailed findings of a Heritage Impact Assessment
- Findings of an independent archaeological investigation of the south of Swinshaw Hall
- An Ecological Assessment
- A Landscape Assessment showing how any new development will respect the existing landscape and character of the site.
- A tree impact plan
- A Health Impact Assessment
- How section 106 monies to be levied will be used in the local area.

These documents should be published in advance and there is no excuse for not having a full suite of finalised documents available for review and consideration by local residents. It feels as though the development is being rushed through without the appropriate oversight, due diligence and consideration of existing residents.

I note that within the wider local plan, some brown field sites have been removed. I believe that it is more important, now, more than ever before, for us to protect our country side and preserve it for future generations. Should Brown Field sites not be considered first, over Green Field sites?

The original pre-planning document stated that the land to be included was degraded, giving the impression that it is not worth keeping. I refute this. The area is a beautiful rural hamlet, which, if development goes ahead will be totally destroyed. The land is not degraded, it is natural country side and wildlife haven providing a habitat for deer, badgers, foxes, bats and owls.

The land is also important to the local farming community providing space for grazing and hay making all year round.

There are already 90 new houses being built in Loveclough and a further 97 at the Woodside development in Rawtenstall. With only one access road in and out of Loveclough adding more development in this area would have a significant impact on the traffic and road ways in this area of Rossendale.

Rossendale Borough council (RBC) has a vested interest in this site (owning part of the land). I would like to know how this conflict of interest will be managed to ensure that decision making is not biased.

I would like it noted that all surveys of the land have been undertaken during periods of relatively dry weather This causes concern as it isn't reflective of this area which is prone to flooding.

Why is this development being considered?

I am disputing this inclusion of this area in the local plan as it seems to contradict many of RBC's principles on development within this local area.

- In 2017 Local Plan Appendix A: Proposed changes stated that:
"In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily relate to local need."

I am not aware of a significant local need in Loveclough which justifies the development of 47 houses on this site, 80 houses at the "Foothills" development and 10 at the side of Loveclough Working Men's club. The impact of which has been so far, completely ignored.

- In 2019, the field where the access road is proposed was rejected as *"uneconomical for development."* Please could you confirm why it is now being considered for development.
- There is substantial housing estate across the valley which is empty. Has the council considered the more environmentally friendly option of renovating existing buildings as opposed to continually choosing to destroy nature and the beauty of the Valley?

Objections to the conditions in the H3 site specific policy

RBC have said that the development of this land will be supported if 15 conditions are met. Some of the documents to support those conditions are not available or unsuitable which is rather worrying.

1. Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation.

I note that, when in talks with local residents about current developments in Loveclough, RBC acknowledged that *"The valley had plenty of 3 and 4 bedroom houses and that this building stock wasn't required."* Certainly the 10 houses at the side of the Working Men's Club and most of the homes on the Foothills development are 3 and 4 bedrooms.

I would like to understand the ratio of affordable housing in any new developments. This is a key document which should be made available to the public in this process.

2. The development is implemented in accordance with an agreed design code.

This document has not been provided in the pre planning documentation and is still outstanding. This should outline the type of materials to be used, maximum heights of buildings, and the architectural styles of the buildings. I am objecting to the development of this land based on the absence of important detail about the development.

3. A transport assessment is provided demonstrating that the site can be safely and suitably accessed by all users prior to development taking place.

There are several objections within this area:

3.i) All access roads for the already approved developments and any proposed developments are all within a 100 yard stretch of road, with a minimum of 180 additional cars from approved development in Loveclough, 200 from through traffic from approved development at Woodside and another 90 from this proposed development there will be a significant increase in the flow of traffic along an already busy road which is the main route from Burnley to Manchester and the only access through Loveclough.

The proposed access road for the 47 houses on this site is very close to the junction from Commercial Street which has significant dwellings, vehicles and developments already. These junctions, so close together, would create additional congestion and would be creating an accident blind spot in area where it is already very difficult to cross the road safely.

The number of cars parking and double parking on the main road has increased significantly over the past 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when access roads are unsafe, that people will not leave their cars on Burnley Road. This is the case currently and impacts on driver visibility and access to Burnley Road.

3.ii) the pre planning document for this site commented that *'the local roads were driven'* and *'site analysis'* were undertaken in April 2020. This means that the report of impact on roads would be severely understated considering that the country was under a National Lockdown due to COVID 19 and road traffic was at 10% at best of its normal traffic levels. This isn't a representative time period to access the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour and no impact assessment of already approved developments. The requirement as published by BBC is "loose" to say the least, a full impact assessment should be undertaken.

4. Heritage Impact

The pre planning document for this development stated that:

*'The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development.**'*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of "free from development"?

5. Archaeological investigation of the area south of Swinshaw Hall for potential historical burial ground.

This investigation needs to be commissioned independently and if there is a burial site it needs to be respected as such and left untouched, with the results published and communicated to the local community.

6. Ecological assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.

The development will have a significant impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development site.

7. A landscape document is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.

Again, this is a key document which is missing.

Have the privacy issues of the existing dwellings been considered? Cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy. This would have a significant impact on the occupier's health and well-being.

8. A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development and secures the appropriate mitigations steps necessary.

All trees around the site have Tree Preservation Orders and these natural habitats should be maintained.

Again, this document is missing and not available to the public.

9. A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.

Although the pre planning document does not consider this site to have flooding constraints, the stream and culvert regularly overflow and flood onto Burnley Road so Drainage is a massive issue. Any buildings on this site will be liable to flooding.

The proposed allocation of 47 houses will have a major impact on drainage and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley Road. In heavy rain residents regularly need to divert flood water into the culvert using sand bags in attempts to prevent Burnley Road from flooding.

The volume of water running from the fields means the path between the park and the proposed development regularly runs like a river and the retaining wall onto Burnley Road has had to be rebuilt several times over the past few years.

All this creates hazardous conditions for drivers, pedestrians and resident's already. This will only be exacerbated by any further developments.

10. New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

The proposed development runs alongside Loveclough Park. Will the facilities be improved as part of this plan? What steps will be taken to ensure residents are safe from anti-social behaviour such as groups gathering late at night, left over alcohol bottles and cans (or worse) and broken glass on the play area? (all of which we already pit up with from the existing park)

11. Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council.

The proposed development is next to the existing Love clough park, with no explanation of the impact on children's safety IF the development was approved.

12. A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents.

The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population. The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

13. A contribution to the creation of car parking provision within the centre of Crawshawbooth.

Again, this was a gap in the pre-planning application and remains one now. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

14. A contribution towards increase school provision within the area. (if identified as necessary)

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely

Victoria Holt

CBRE Limited
One St Peter's Square
Manchester M2 3DE

[REDACTED]

Forward Planning
Rossendale Borough Council
Business Centre
Futures Park
Bacup
OL13 0BB

15 October 2021

By email only forwardplanning@rossendalebc.gov.uk

Dear Sir/Madam

ROSSENDALE LOCAL PLAN (2019 - 2034) - CONSULTATION ON PROPOSED MAIN MODIFICATIONS TO THE LOCAL PLAN

I write on behalf of my client, United Utilities Property Services (UUPS), in respect of their site at Sheephouse Reservoir, Bacup ('the site') in response to the consultation on the Proposed Main Modifications to the Local Plan published by Rossendale Borough Council (RBC) for a period of 6 weeks from 3 September – 15 October 2021.

Over the last 10 years, CBRE has held numerous discussions with the Forward Planning Team at RBC and has submitted a number of representations on behalf of UUPS in respect of the site to a variety of Local Plan documents. As such, this letter should be read alongside the previous representations made by UUPS. A pre-application request has also been submitted in respect of the site and is currently being considered by planning officers at RBC.

As demonstrated within these representations, UUPS is committed to working with RBC in this respect and fully support them in bringing forward this new Local Plan. UUPS particularly support the allocation of this important site for much needed housing in the borough.

Following the Local Plan Examination in Public Hearings held in September and October 2019, and further evidence base work undertaken by the Council during 2019- 2021, the Inspectors have now published the Schedule of Proposed Main Modifications ('Main Mods') to the Publication (Regulation 19) Draft Plan, which are proposed amendments needed to make the Local Plan sound and legally compliant.

These representations provide the background and context to the site and set out UUPS support for the proposed changes (main mods) in respect of the site.

BACKGROUND AND CONTEXT

The site has been promoted by CBRE on behalf of UUPS for many years. As a result, the site was allocated for housing development within the Local Plan Submission Version (March 2019) under Policy HS2, site number H28 – Land at Sheephouse Reservoir. The accompanying Proposed Green Belt Changes and Urban Boundary Changes (Local Plan Submission Version) confirmed that the

urban boundary around Bacup would be amended to include the site as part of the urban extent. The associated Housing Trajectory set out that the site would be delivered within years 6-10 – primarily in years 6 and 7 (2024-2025) - and stated that the estimated yield is 63 dwellings, taking into account the site specific opportunities and constraints¹.

CBRE submitted detailed representations to the Local Plan Submission Version in September 2019 along with a request for pre-application advice. This request was supplemented with additional information in 2020, as described below. In addition to this, we have remained in regular contact with RBC officers in this regard.

2019 Technical Work

A number of technical assessments were undertaken during 2018/2019 to demonstrate the development potential of the site. This included an assessment of the topography of the site, flood risk and drainage considerations, ecological value, landscape and visual impact and highways and access. These detailed studies were shared with RBC and referred to within representations submitted in September 2019. In summary, the technical work undertaken demonstrates that the site is suitable, based on the following key points:

- The development of the site would have minimal impact upon the site and surrounding area;
- The site is well located adjacent to the existing urban boundary and is already influenced by the adjacent suburban townscape character;
- The site would form a logical and appropriate location for new housing; and
- The location and physical characteristics of the site will enable the natural extension to the surrounding residential areas to the east of Bacup, with the potential to provide open space to meet local deficiencies and improve community and recreational facilities.

Based on the findings of these technical assessments, an illustrative plan was prepared to identify a potential developable area on site, areas for mitigation and an indicative site access.

Following the completion of this technical work, the Council proposed revising the delivery timescale during the Examination Hearings from Years 6-10 to Years 1-5.

2020 Technical Work

Further to this, in preparation for bringing the site to market, UUPS instructed further technical work and subsequently submitted a pack of additional information to supplement the pending pre-application request during May 2020. This included the following supporting technical reports and drawings:

- Indicative Masterplan, prepared by mck associates limited (Ref: 20-018 dated 21st May 2020);
- Pre-application Highways and Transport Note prepared by CBO (Ref: 0612-003); and
- Draft Ecological Statement prepared by Bowland Ecology (Ref: BOW 20/340).

¹ The Landscape Study, which forms part of the Council's evidence base, concluded that the entirety of the site can be developed, subject to suitable mitigation in the more sensitive locations.

An updated masterplan was prepared, informed by the updated ecological constraints assessment and a technical highways and transport note. The indicative masterplan demonstrates that the site could deliver up to 100 units, depending on the mix and type of dwellings. As can be seen on the plan, the delivery of residential development is possible on the two areas of land, together with suitable site infrastructure and landscaping. The indicative layout retains the existing public rights of ways that cross the site.

It is proposed that a new site access point will be created along Rochdale Road (A671), south east of Farrington Road, to provide access to the development via a single priority junction arrangement. The proposed access arrangement is based on a topographical survey and traffic/ speed survey data.

The existing access to the operational pumping station, located further south, would be retained off Rochdale Road. Access along Bobbin Close to Higher Slack Farm will also be retained. The appointed transport consultant, CBO, has been in consultation with Lancashire County Council (LCC) Highways in respect to the acceptability of the proposed access arrangement. The feedback received from LCC Highways Officers on 4 May 2020 suggested that the proposed location for the access would seem achievable and deliverable within the context of the local highway network, subject to detailed design. The Highways and Transport Note also considers the provision of a pedestrian access to the site via the A671 Rochdale Road.

RBC is currently considering the pre-application request and we anticipate receiving the detailed, written pre-application advice imminently.

2021 Work

The Inspectors requested that RBC produce a note to set out that the Sheephouse Reservoir site could be delivered in Years 1-5. RBC responded to this within the Schedule of Action 10.1-10.9 (consulted on between March – April 2021). UUPS supported the summary provided by RBC and provided additional commentary within our March 2021 representations.

MAIN MODIFICATIONS

The proposed main changes to the Plan in respect of the site include the following:

- MM008 relating to Policy HS2: Housing Site Allocations (Pages 19 to 22):
 - The site reference has been amended from ref. H28 to H24;
 - The delivery period has been amended from Years 6-10 to Years 1-5;
- MM009 relating to Housing Site Specific Policies (New Policies starting at Page 23 Below para 59):
 - Policy wording relating to this site has been added as follows:

H28 H24 – Sheephouse Reservoir, Britannia

Development of up to 63 dwellings will be supported provided that:

1. *A Flood Risk Assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigation measures necessary;*
2. *Development avoids land identified as a stepping stone habitat for the Wetland and Health Ecological Network;*

3. *An Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Wetland and Heath Ecological Network and stepping stone habitat located within the site;*
4. *A Landscape Assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site;*
5. *A landscape view is created around the stepping stone habitat and a landscape buffer zone is created using native planting along the northern boundary of the site;*
6. *A contaminated land survey and appropriate remediation strategy is submitted and secured prior to development taking place on site.*

Explanation

Part of the site is at high risk of surface water flooding. Most of the site is classified as a wildlife corridor serving the Lancashire Ecological Network for Wetland and Heath. Part of the site to the west is identified as a stepping stone habitat. Opportunities will exist to secure on-site improvements in biodiversity. A landscape assessment was undertaken for the site as part of the Lives and Landscape Assessment 2017 which recommended suitable mitigation measures for any future development. The site has recorded areas of contaminated land connected to historic land uses and therefore investigations and relevant remediation measures will be required.

UUPS support the expected delivery of this site within Years 1-5, and thus support the proposed Main Modifications to the Plan. The investment which has been made over the last 10 years by UUPS in promoting the site and particularly in undertaking technical assessments demonstrates its commitment to the delivery of the site.

Furthermore, the additional technical work which has been undertaken in relation to the pre-application process and to address matters raised by the Inspector demonstrates that the site is a deliverable residential site.

The technical reports undertaken demonstrate that the site could accommodate up to 100 dwellings, whilst also delivering suitable publicly accessible open space and ecological enhancements. Additionally, an appropriate access arrangement is achievable from Rochdale Road to provide access to the entire site.

Overall, it can be concluded that there are no technical constraints to delay the delivery of this site within Years 1-5 of the Plan period. UUPS therefore consider that the Plan should be amended as set out within the Main Mods.

We trust that these representations will be taken into consideration as the Plan is now finalised, and we look forward to continuing discussions with RBC in respect of the site on behalf of UUPS.

Yours sincerely



ALICE MAY
SENIOR PLANNER – PLANNING & DEVELOPMENT

Cc: [REDACTED]
[REDACTED]
[REDACTED]

Mr P Nelson & Ms J Marsden



14/10/21

forwardplanning@rossendalebc.gov.uk

Ref MM009 H3 Swinshaw Hall. (previously EL8.009.1 Land site H5) objection to inclusion in the Local Plan.

I am writing to object to the inclusion of MM009 H3 Swinshaw Hall in the Rossendale Local Plan (2019-2036).

General Comments:

Upon reading the list of requirements for planning to be approved, I find that many of the key documents are not available. These should be published in advance, with local residents able to object before a final decision is taken on the development. There really is no excuse for not having a full suite of finalised documents available for review and consideration by the local residents, given the pre-planning objections were made in February and only the number of dwellings has changed from 67 to 47. It feels like the development is being rushed through to tick boxes without the appropriate oversight, due diligence and consideration of the existing residents.

I note that within the wider plan some brown field sites have been removed but none of the Green field sites have been removed, which again seems like the wrong direction. We should be protecting our natural countryside and using the brownfield for housing as this would improve the latter areas, although I am guessing these sites are less marketable for prospective developers. The original pre-planning document classed the land as “degraded” giving a view to the reader that it is not worth

keeping and that development is a much better option, which I refute. The area is a beautiful rural village, which if this development goes ahead will be destroyed. The land is not “degraded” it is a natural countryside and a wildlife haven, home to deer, foxes, badgers, bats and owls. I feel it is more important now, than ever before, to preserve areas such as this for future generations and the sake of the environment.

The land is also important to the local farming community providing grazing for livestock all year round and necessary space for hay making to feed livestock over the winter months.

There is only one access road into and out of Loveclough, with 90 houses currently being built in Loveclough and a further 97 dwellings at the Woodside development undertaken by Taylor Wimpey (the approved Woodside development will add approximately 193 additional cars) ahead of a potential 180 for the developments already approved in Loveclough, before the inclusion of an additional 94 if this development was agreed. All of which will impact significantly on Burnley Road.

As raised previously Rossendale Council has a vested interest in this development, which was omitted from the 178-page pre-planning document. I would like to know how the conflict of interest is being managed, as surely the decision making will be biased if Rossendale Borough Council is deciding on a proposal within which it has a vested interest?

Can you tell me the percentage levied and value of section 106 monies to be levied on this development and how these are to be used, this funding is essential for the area and should not be seen as discretionary.

I note that surveys of the land have all been undertaken during relatively dry periods of weather and not during or after any periods of rain, which causes concern also as this isn't reflective of the environment.

Why is this development being considered?

I am disputing the development as it contradicts many of Rossendale Borough Council's principles on developments within this local area and I am unclear why this proposal is still being considered as:

- The 2017 Local Plan Appendix A: Proposed Changes references the following

“In smaller settlements such as Goodshaw, Loveclough, Irwell Vale, Water and Weir the level of development should primarily support and relate to local need”

I am not aware of a significant local need on Loveclough which justifies this 47 home development in addition to the 80 homes being built already plus the 10 dwellings at the side of Loveclough Working Men's club, the impact of which is completely ignored and un-referenced in the pre-planning document.

- In 2019, the field where the access road is proposed, was in the previous local plan and rejected as it was deemed “uneconomical” for development, so I am unclear why dwellings, a roundabout and roads on this land are being proposed and considered. Please can you confirm what has changed since 2019? I also note that the document is no longer available on RBC’s website, but should be retained under retention of records legislation applicable to public bodies.
- There is substantial housing estate across the Valley which is empty. Has the Council explored using this estate and renovating existing buildings as opposed to continually choosing to destroy the beauty of the Valley by building more homes, whilst significant building stock is left to sit empty and start to fall into disrepair?

There were c 5,000 empty properties across the Valley (2018). I would be interested to know the number currently. It would be more economical and environmentally friendly to renovate these and RBC should be challenging Government policies as this isn’t a situation which is unique to them.

Objections to the Conditions in the H3 Site Specific Policy:

RBC have said that the development will be supported if 15 conditions are covered, some of which are documents which should have been produced within this process. The way the Schedule of Main Modifications reads is that these need to be completed before work commences as opposed to before planning is considered, which is rather worrying.

- **Comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation**

In the pre-planning documentation, it references “off-market” discussions with builders has identified the types of houses to be proposed. I note that Rossendale Borough Council when speaking to residents when the plans were being discussed relating the approved development of 80 houses had confirmed that “the valley had plenty of 3 and 4 bedroom houses and this building stock wasn’t required”. I would like to understand the ratio of houses and affordable housing. This again is a key document which should be made available to the public within this process.

Certainly the 10 properties being built at the side of Loveclough Working Men’s club appear to be 3 / 4-bedroom houses.

The 80 homes currently being built to the South side of Burnley Road / commercial street from the information on-line are for open sale:

5 bed detached – 5 in total

4 bed detached – 27 in total

3 bed detached – 12 in total

3 bed townhouses – 12 in total

In terms of affordable – social rent / shared ownership these are

2 bed semi mews – 10 in total,

3 bed semi mews – 10 in total

4 bed semi mews – 2 in total

2 bed bungalow – 1 in total

- **The development is implemented in accordance with an agreed design code.**

Within the original pre-planning documentation this was not outlined and is still outstanding. This is a key piece of information which should be part of this process as this contains the guidelines/ rules that the development must be designed in accordance with. This should outline the type of materials to be used, maximum building heights or architectural styles of the building. I am objecting to the development based on absence of important detail of the development.

- **A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. This should provide details of suitable vehicular access from Burnley Road, including access by pedestrians and cyclists and all required mitigation measures such as relocation of the bus stop.**

There are several objections within this area relating to the proposed development:

3i) All access roads for the new approved developments and this proposal are within a 100-yard stretch of road, with a minimum of 180 (minimum) additional cars on the road (due to the existing new development), plus an increased through put of traffic of another c.200 from the Woodside development. This is a significant increase in traffic before the additional 47 homes, with 2 cars, equates to another 94 cars in addition.

The proposed access road for the 47 houses is very close to the junction from Commercial Street, which has significant dwellings and vehicles existing, plus there is a large housing estate at the bottom of Commercial Street.

All this additional traffic will try to get on a very busy Burnley Road, the main route from Burnley to Manchester which accommodates significant HGV traffic currently. This road is also a 40mph road and is the only access road through the village

“Site accessed safely” is an issue with driver visibility being a significant problem. “The masterplan produced by TPM landscapes demonstrates that visibility splays of 2.4m x 90m (in both directions to nearest kerb lines) can be achieved at a new site access junction with Burnley Road.” The three junctions so close together would create additional congestion and would create an accident black spot. Crossing the road safely is a significant issue.

There have been numerous near misses especially with a blind corner within 400m of the proposed additional junction.

The number of cars which park on the road and double parking has significantly increased over the last 12 years, with most houses having 2 cars and no parking. Although the plans would provide for parking, there are no guarantees that in periods of inclement weather, when the access roads are not safe, that people will not leave their cars on Burnley Road. This is certainly the case currently and impacts on driver visibility and access to Burnley Road.

3ii) The local road infrastructure

The pre-planning document commented that the “local road were driven” and “site analysis” was undertaken in April 2020. This means that the report of impact on roads would be severely understated, as at this point the country was under a national lockdown due to COVID and road traffic was at 10% at best of the normal traffic levels and certainly with the schools closed, this isn’t a representative time period to assess the impact.

There was no sensitivity analysis performed on the journey times taken to access Rawtenstall and the motorway network at rush hour times, and no impact assessment of the already approved development. The requirement as published by Rossendale Council is “loose” to say the least, a full impact assessment should be undertaken.

Is there consideration of providing access at the bottom of Goodshaw Lane by widening the road here and providing an access point at the bottom of this road.

Heritage Impact Assessment:

The pre-planning document did not include this level of detail within it, and this feels like a key document the public should be able to see and object but did include the following extract.

*“The historic landscape setting on Swinshaw Hall will experience the main influence of this site. This area is sensitive, and the retention of this land as public open space, linking the northern and southern areas of development, would help preserve the setting to the Hall, whilst also helping to lessen the potential for visual harm to the eastern end of the CA. To be clear, Officers do not support the provision of dwellings within any part of this area, including the hatched area in the indicative Masterplan (identified as possible scope for a small number of dwellings). This small piece of land contains TPOs and has a PROW running through it and **must remain free from development**”*

Can you tell me how building a significant access road, roundabout and dwellings does not fall within the definition of “free from development”?

- **Archaeological investigation of the area south of Swinshaw Hall for potential historic burial ground.**

This investigation needs to be commissioned independently and if there is a burial ground it needs to be respected as such and left untouched, with the results published and communicated to local residents.

- **Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the Grassland Ecological network and stepping stone habitat located within the site.**

The development will have a major impact on the wildlife in the area, with bats, badgers, foxes, owls and deer all living within the proposed development sites. The land considered within this development is so boggy that it is largely untouched by people and wildlife are living in a haven currently, untouched by human intervention.

- **A landscape assessment is submitted with details relating to layout, design and landscaping, showing how the development would respect the landscape character of the site and the views into and from the site.**

Again, this is a key document which is not available for scrutiny.

Have the privacy issues of the existing dwellings been considered as the cars using the proposed access road may be able to see into these properties, resulting in a loss of privacy.

Looking at the plan for the layout of the access road, there is a significant risk that vehicles accessing the road at night, the headlights would shine directly into the front of properties on Broad Ing and the back of the School House. This would impact significantly on the occupiers of the building and would impact on their health and well-being.

- **A tree impact plan and tree constraints plan are submitted with their findings secured and agreed prior to development taking place on the site.**

All the trees around the site have a tree preservation orders and these natural habitats should be maintained. Again, this is not included so the full information for the development is not available to the public.

- **A flood risk assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigations steps necessary.**

The pre-panning document considered that the Flood Risk and Drainage is within Flood Zone 1 and this site is not considered to have flooding constraints, the river regularly floods and floods Burnley road, so drainage is a massive issue. Any building on this field where the access road is planned (parallel to Burnley Road) will be liable to flooding as there is a stream and culvert, which regularly floods.

The proposed allocation of 47 houses would have a major impact on draining and flooding, in particular for those living at Broad Ing House, Croft and Cottage and those living opposite on Burnley road, which will have an impact on other dwellings within the surrounding area. In heavy rain the excessive run off water needs to be diverted with sandbags into the culvert, which regularly floods across the main road (Burnley Road).

The natural flow of the water is from the fields above Goodshaw Lane into the two fields, with water running under one of the fields from Hambleton Road and water running across the middle of the proposal parallel to Burnley Road, with a natural spring in place too.

The path between Loveclough park and the site floods regularly and flows on to Burnley road opposite Commercial street. This is no surprise with the volume of water which comes from these fields on to the roads, and the fact that the retaining wall has had to be rebuilt on numerous occasions as the volume of water regularly pushes it out

This creates hazardous conditions for passing traffic and pedestrians which will only be exacerbated by this further development.

- **New on-site open space is provided which leads to equivalent or better provision of open space in the area. The on-site open space should provide a functional parkland setting for Swinshaw Hall with details of an on-site play area in accordance with the parameters plan below:**

Section 7.0 Visual Appraisal page 60 of the document reflects VP6 Swinshaw Hall with multiple upper floor and garden views over the central site has – “High Susceptibility”, it is also noted that Vp11 Properties on Broad Ing are also deemed as “high susceptibility”,

Have conversations taken place with all parties impacted by this development. There is reference to trees providing some coverage, but these would only be during the summer months, which would leave six months with no protection. All the screening to mitigate the visual receptors appears to be from the direction of Swinshaw Hall and none of the other “High Susceptibility” properties, which is not proportionate or fair.

On page 130 of the pre-planning document it talks about protecting the land immediately to the west of Swinshaw Hall – is this the field opposite Broad Ing? So, can Rossendale Borough Council guarantee that there will be no further development considered in this area and that the current proposals for dwellings are removed from the plan?

- **Details are submitted which clarify the relationship between the development and the adjacent Loveclough Park.**

This is an interesting requirement as Loveclough park has not been mentioned within the pre-planning document. The local community should be made aware of this and any proposed changes and be given the opportunity to object ahead of a planning decision made by Rossendale Council. The proposed development is next too the existing park, with no explanation of the impact on children’s safety IF the development was approved.

- **A Health Impact Assessment is submitted with its recommendation secured and agreed prior to development taking place on site.**

This is a fundamental document which should be available within this process as it evaluates the impact of the development on health and well-being of the existing and future residents.

The pre-planning proposal did not offer to contribute to either primary care services or dental services, of which the closest are in Rawtenstall. These developments in totality need to ensure that the services can accommodate the new residents, given the significant financial constraints on health funding and public sector funding. This should have been completed over the last 6 months since the pre-planning submission? How is the Council addressing this?

The proposal is to build 47 houses across the two fields and facing on to Burnley Road. This equates to 188 additional people based on an assumption of 4 residents in a dwelling and 94 additional cars, based on 2 per household. This could be even higher if the development includes 5-bedroom houses.

The pre-planning application does not consider the already planned development on the west side of Burnley Road (opposite this development), which is the building of an additional 80 houses, which will have a massive impact on the road infrastructure, educational and health needs of the population.

The local area is already undergoing significant disruption from the agreed 80 house development, and this proposed development would compound this for a number of years.

- **A contribution to the creation of car parking provision within the centre of Crawshawbooth.**

Again, this was a gap in the pre-planning application and remains one now and proposals should have been worked on over the last 6 months. This financial contribution will need to be significant as would involve significant works to create parking on what is a very built up area i.e. purchase and demolition of existing buildings and making good a site. Rossendale Council could contribute through section 106 monies received from the developers of the sites already underway in Loveclough.

- **A contribution towards increase school provision within the area. (if identified as necessary)**

Again, this is a key document which is unavailable. The pre-planning document used the same wording as included in the Rossendale Local Plan (2019/2036) Schedule of Main Modification September 202.

I would feel that this would be necessary both for Crawshawbooth primary and for impact on the local secondary school which is Alder Grange.

Crawshawbooth primary school is already operating at near capacity as is Alder Grange school, with both schools being over-subscribed within the existing catchment area and residents. Although there is no obligation to build a school if there are places within the Valley, I would like to know the current demand for school places compared to the population demographics and what impact this development has?

If the developer chose to do works on the existing school site, for instance adding an additional floor to accommodate the demand for school places, then can you outline the proposal for how this is done without impacting on the functioning of the school and disrupting the education of our children, which has been significantly disrupted over the last 12 months of the pandemic.

I am objecting to the principle of this development as it does not meet the local need criteria outlined by Rossendale Council, the pre-planning document, although long and difficult to read, does not provide key information for the public to have a full understanding of the proposal and the impact assessments currently available are flawed and out of date. This proposal should come back to the public once a full suite of documents is available to comment and object to. This development is nowhere near being given planning consent and should not be considered until all documents are available for comment / objection.

Please record my objection to the Swinshaw Hall, Loveclough H3 development and its inclusion in the Rossendale Local Plan (2019-2036).

Yours sincerely,

Mr P Nelson & Ms J Marsden

ROSSENDALE LOCAL PLAN CONSULTATION

These comments are made on behalf of the nine Rossendale GP Practices (listed below) through their representative Primary Care Network, which is listed as a named consultee by Rossendale Borough Council. These comments are intended to ensure that health infrastructure needs are recognised in the local planning process.

The link between planning and health is long established. The planning system has an important role in creating healthy communities; it provides a means both to address the wider determinants of health and to improve health services and infrastructure to meet changing healthcare needs. Consultation between Local Planning Authorities (LPAs), public health and health organisations is a crucial part of this process.

All nine of the Rossendale GP Practices are currently either at full capacity or very near to full capacity in terms of the number of additional patient registrations that they can currently absorb, therefore at the moment any new housing developments greater than 10 dwellings, will have a direct impact on the ability of the GP Practices affected to continue providing General Medical Services to its registered patient list.

The alleviation of this capacity issue would require mitigation either through the direct provision of infrastructure (if applicable) or the payment of an appropriate financial contribution.

In line with the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) / Section 106 requests for development contributions must comply with the three specific legal tests:-

1. Necessary
2. Related to the development
3. Reasonably related in scale and kind

It is our understanding that in general terms, most S106 agreements allow the following improvements to health facilities:-

- The reconfiguration or expansion of health premises to provide additional facilities and services to meet increased patient or user numbers;
- New health premises or services at the local level to provide additional facilities and services to meet increased patient or user numbers;
- Any new facility required to compensate for the loss of a health facility caused by the development.

It is recognised by the Rossendale Primary Care Networks that S106 monies may only be spent on facilities / infrastructure where the impact of a new development has, at least in part, contributed to the need for the facilities. S106 funding is available for capital projects only. Revenue funding

towards on-going running costs is not available. It will be necessary, when requesting funding through S106, that existing permissions on other sites providing pooled contributions to the same piece of infrastructure are declared, to ensure transparency.

In order to respond to future planning applications the Rossendale Primary Care Networks would look to assess the impact on any local practices whose catchment area is within a specific radius of the development. All GP practices have well established Practice Boundaries. Contributions received by the Rossendale PCN will only be expended on facilities within that radius / boundary. The PCN would also use local knowledge and intelligence regarding premises conditions, and numbers of clinical rooms and ability to accommodate growth to inform the response. One or more general practices may be named as an expected recipient of the funding for alterations or extensions to existing premises and in some cases the PCN may also highlight the requirement for a strategic infrastructure solution. In response to a planning application consultation the PCN would clearly identify where extra capacity is required and determine exactly where the finances are to be directed towards a single "identified project". Such details will be set out within the planning obligation thereby clearly linking the obligation to the specified scheme. Such an "identified scheme" may involve more than one local practice in a settlement where capacity has to be met at more than one location. This will still be one project but implemented across two sites.

Requests for CIL funding will be made in line with the process of Rossendale Borough Council.

The nine Rossendale GP Practices are:-

St James Medical Practice, Hazelvalley Family Practice, Haslingden Healthcare, Rossendale Valley Medical Practice, Fairmore Medical Practice, Irwell Medical Practice, Waterfoot Medical Practice, Irwell Medical Practice and Whitworth Medical Practice

Dr Abdul Mannan - Clinical Director of Rossendale West PCN

6th September 2021

Dear Sirs

Thank you for consulting us on the above. We respond on behalf of KFC (GB) Limited (**1510**) in respect of Policy R5.

Whilst the policy still relies on a disproportionate link between proximity of hot food takeaways to schools and the incidence of adverse health, for which the evidence is weak and contradictory, we welcome the removal of primary schools as there is clearly no mechanism in such cases.

Whilst we also welcome the fact that the policy would impose hours restrictions on hot food takeaways near secondary schools outside town and district centres rather than refuse them outright, we note that no assessment of viability impact exists so that this might amount to the same impact.

Finally, we **OBJECT** to the modification of the obesity proportions in criterion (d), as the evidence for and effect of the new thresholds is entirely untested at examination and raises fundamental questions as to the classification of obesity in children with respect to body mass indices.

The very minimum that should be provided to deal with this objection is citation of the reference dataset against which the threshold will be measured, mapping of wards in which the thresholds are currently exceeded and an explanation of why the specific thresholds have been chosen.

We consider that further discussion of, formal consultation on or a further hearing into this additional evidence would be necessary to ensure that the tests are met. We attach an NHS guide on classifying body mass indices in children, which provides useful background on this issue.

Yours faithfully

Steve Simms MA MRTPI
Director

██████████
██████████

SSA Planning
PO Box 10201
Nottingham
NG9 9FZ

SSA Planning Limited. Registered in England. Company number: 08454755. Registered Office: 22, Eldon Business Park, Beeston, Nottingham, NG9 6DZ. Please notify us if you are not the intended recipient of this email and do not use or disclose its contents. We accept no liability for damage caused by viruses.

A simple guide to classifying body mass index in children

June 2011

Delivered by NOO on behalf of the Public Health Observatories in England

What is the purpose of this paper?

This paper provides a simple guide to how body mass index (BMI) can be used to assess the weight status of children. It describes the different methods that can be used to interpret BMI in children and young people, explains how the methods differ, and where each method is commonly used.

Why do we use BMI?

- BMI provides a good indicator for levels of body fat. Having a BMI that is either too low or too high is associated with an increased risk of ill health.
- BMI is relatively cheap to obtain and easy to calculate. As a result it is used for population surveys and by health professionals when assessing individual patients.
- BMI is therefore the most frequently used measure for assessing whether adults or children are obese, overweight, underweight, or a healthy weight.

Why is BMI classification different for children and adults?

- The BMI of adults remains relatively constant, regardless of age, unless they gain or lose a lot of weight. When classifying the BMI of adults it is possible to use the same categories (also called thresholds, or cut-offs) for defining underweight, overweight or obesity, regardless of the age and sex of the adult.
- Adults (aged 18 years and above) of all ages are usually classified as obese if their BMI exceeds 30kg/m^2 , or overweight if their BMI is greater than 25kg/m^2 . Individuals with a BMI of less than 18.5kg/m^2 are usually considered underweight.
- Assessing the BMI of children is more complicated than for adults because a child's BMI changes as they mature. Growth patterns differ between boys and girls, so both the age and sex of a child needs to be taken into account when estimating whether BMI is too high or too low.
- Because the relationship between a child's BMI and the level of fatness changes over time, fixed thresholds such as those used for adults should not be applied to children as they would provide misleading findings.

How is child BMI classified?

- Instead of using fixed BMI thresholds to classify individuals (as used for adults) children's BMI is categorised using variable thresholds that take into account the child's age and sex.
- These thresholds are usually derived from a reference population, known as a child growth reference. They are calculated by weighing and measuring a large sample of children to identify how BMI varies by age and sex across the population. As well as showing the pattern of growth, these data also provide an average BMI for a boy or girl at a particular age, and the distribution of measurements above and below this value. This means that individual children can be compared to the reference population and the degree of variation from an expected value can be calculated.

- BMI thresholds are frequently defined in terms of a specific z score*, or centile, on a child growth reference. Once a child's BMI centile or z score has been calculated, this figure can then be checked to see whether it is above or below the defined thresholds for the child growth reference used.
- There are a number of different child growth references available. The last section of this paper describes these different references, and also describes when and where they are commonly used.
- Each growth reference tends to have a set of recommended thresholds. These thresholds are usually defined by statistical conventions, for example, a whole number of standard deviations from the mean, or a whole number of centiles (such as the 85th and 95th centiles). One exception is the International Obesity Task Force (IOTF) thresholds which are derived to line up with the adult BMI thresholds for obesity and overweight at age 18 years.

What are the different child growth references?

- Many countries have their own population-specific thresholds for assessing BMI in children. The child growth references that are commonly used in UK and international studies are summarised below.
- In England the British 1990 growth reference (UK90) is recommended for population monitoring and clinical assessment in children aged four years and over. Other BMI thresholds are sometimes used, particularly for international comparison of obesity prevalence.
- It must be noted that data should only be compared when the same threshold has been applied. For example, comparisons should not be made between obesity prevalence calculated using the UK90 growth reference with obesity prevalence calculated using the IOTF thresholds.
- The UK90, IOTF, Centers for Disease Control (CDC) charts and World Health Organization (WHO) charts for ages from 5 to 19 are growth references which provide comparators with the general population, whereas the WHO charts for ages 0 up to 5 are a growth standard and aim to provide an indication of optimal growth.

What child BMI references are used in the UK and in international studies?

The following pages provide a question and answer summary of the most commonly used child BMI thresholds in the UK. For each set of thresholds the reference population is described, and a brief summary given of the methodology and cut-offs used for defining underweight, overweight, and obesity in children.

Examples are given of the main uses of each set of thresholds within the UK and internationally. Links to further information are provided to websites and academic papers.

* A BMI z score or standard deviation score indicates how many units (of the standard deviation) a child's BMI is above or below the average BMI value for their age group and sex. For instance, a z score of 1.5 indicates that a child is 1.5 standard deviations above the average value, and a z score of -1.5 indicates a child is 1.5 standard deviations below the average value.

British 1990 growth reference (UK90)

1. What is the size of the reference population and when were the data collected?

The UK90 BMI reference provides centile curves for BMI for British children from birth to 23 years. They are based on a sample of 32,222 measurements from 12 distinct surveys collected between 1978 and 1994. The BMI reference curves are part of the wider British 1990 growth reference which also includes height, weight, head circumference and waist circumference.

2. What age range of children/ young people is covered?

0-23 years.

3. Where was the reference population sampled from?

UK population only.

4. What BMI cut-offs are used?

- Underweight: 2nd centile for population monitoring and clinical assessment
- Overweight: 85th centile for population monitoring, 91st centile for clinical assessment
- Obese: 95th centile for population monitoring, 98th centile for clinical assessment.

The UK90 BMI reference is available on printed growth charts, where the centiles are shown evenly spaced at 2/3rds of a standard deviation. This means the 0.4th, 2nd, 9th, 25th, 50th, 75th, 91st, 98th and 99.6th centiles are shown.

5. How are these thresholds used?

For children aged four years and over:

- Population monitoring thresholds are used for most published obesity and overweight prevalence figures, e.g. those using Health Survey for England and National Child Measurement Programme (NCMP) data;
- Clinical cut-offs are recommended by NICE for use in clinical settings with individual children. Also used for NCMP parental feedback and the NHS choices BMI calculator.

The UK90 thresholds are rarely used outside the UK.

6. Where can I find more information?

Charts available to order at: www.healthforallchildren.co.uk

Published in the Archives of Disease in Childhood: <http://adc.bmj.com/content/73/1/25>

- Cole TJ, Freeman JV, Preece MA. Body mass index reference curves for the UK, 1990. Archives of Disease in Childhood 1995;73: 25-9.
- Cole TJ, Freeman JV, Preece MA. British 1990 growth reference centiles for weight, height, body mass index and head circumference fitted by maximum penalized likelihood. Statistics in Medicine 1998;17: 407-29.
- Freeman JV, Cole TJ, Chinn S, Jones PRM, White EM, Preece MA. Cross sectional stature and weight reference curves for the UK, 1990. Archives of Disease in Childhood 1995;73: 17-24.

International Obesity Task Force (IOTF) cut-offs

1. What is the size of the reference population and when were the data collected?

These samples include 192,727 children aged 0 to 25 years. Each national data set has over 10,000 subjects, with age ranges covering at least the period from 6 to 18 years. The most recently available survey data from the United States (1988-94) were excluded as data which pre-dated the recent rise in obesity prevalence were preferred.

2. What age range of children/ young people is covered?

2-18 years.

3. Where was the reference population sampled from?

The IOTF thresholds are derived from body mass index data from six large, nationally representative, cross-sectional surveys from Brazil, Great Britain, Hong Kong, the Netherlands, Singapore, and the United States.

4. What BMI cut-offs are used?

Age and sex specific cut-off points that are extrapolated from the adult BMI cut-offs of 25kg/m² and 30kg/m² for overweight and obesity respectively. Three grades of thinness are defined from equivalent adult BMIs of 16, 17 and 18.5.

5. How are these thresholds used?

The IOTF thresholds are widely used internationally. They are used primarily for making international comparisons or when presenting child overweight and obesity data in academic journals. These thresholds are occasionally used with other data sources, such as data from the Millennium Cohort Study.

6. Where can I find more information?

- Cole TJ, Bellizzi MC, Flegal KM, Dietz WH. Establishing a standard definition for child overweight and obesity worldwide: international survey. *BMJ* 2000;320: 1240–3.
- Cole TJ, Flegal KM, Nicholls D, Jackson AA. Body mass index cut-offs to define thinness in children and adolescents: international survey. *BMJ* 2007;335: 194-202.

World Health Organization (WHO) Child Growth Standard

1. What is the size of the reference population and when were the data collected?

The BMI standard is based on a total of 26,985 records with both weight and length (0-24 months) or height (24-71 months), information taken from the Multicentre Growth Reference Study (MGRS) between 1997 and 2003. This study also included a longitudinal follow-up from birth to 24 months and a cross-sectional survey of children aged 18 to 71 months.

Standards are provided by sex and: length/height for age; weight for age; weight for length; weight for height as well as BMI for age.

2. What age range of children/ young people is covered?

0-5 years.

3. Where was the reference population sampled from?

The WHO Child Growth Standard is based on an international sample from Brazil, Ghana, India, Norway, Oman and the United States.

4. What BMI cut-offs are used?

WHO suggest a set of thresholds based on single standard deviation spacing (i.e. +1 SD, +2 SD etc).

However on the WHO / UK90 child growth charts (for use with children aged under four years), the 91st and 98th centiles are shown for classifying individual children as overweight or obese. For population monitoring in this age group the 85th and 95th centiles of the WHO reference are used.

5. How are these thresholds used?

The WHO Child Growth Standard is used internationally, although IOTF is more widely used.

Growth Standards for 0-4 years are recommended for use in the UK.

6. Where can I find more information?

www.who.int/childgrowth/standards/
www.bmj.com/content/340/bmj.c1140
www.who.int/childgrowth/mgrs/en/

World Health Organization (WHO) 2007 growth reference

1. What is the size of the reference population, and when were the data collected?

The WHO 2007 growth reference was developed using the same method as used for the WHO Growth Standards, but merging data from the cross-sectional component of the WHO Multicentre Growth Reference Study (MGRS) (for children aged 18-71 months) with data used for the earlier National Center for Health Statistics (NCHS)/WHO growth reference (children aged 1-24 years).

The NCHS/WHO reference was based on a sample of children of European ancestry in the United States, collected during the 1960s and 1970s.

The 2007 reference is available for both height and weight for age as well as for BMI. The WHO 2007 reference almost perfectly aligns with the WHO Child Growth Standards at age five years.

2. What age range of children/ young people is covered?

5-19 years.

3. Where was the reference population sampled from?

The WHO 2007 growth reference was derived from a combination of the USA National Centre for Health Statistics 1977 pooled growth data, and the WHO Multi-centre Growth Reference Study (MGRS) from Brazil, Ghana, Norway, India, Oman, USA.

4. What BMI cut-offs are used?

WHO suggest a set of thresholds based on single standard deviation spacing.

- Thinness: <-2SD
- Overweight: between +1SD and <+2SD
- Obese: >+2SD

5. How are these thresholds used?

The WHO 2007 growth reference is used internationally, although the IOTF thresholds are more widely used.

6. Where can I find more information?

www.who.int/growthref/en/

www.who.int/childgrowth/mgrs/en/

- WHO Multicentre Growth Reference Study Group. WHO Child Growth Standards Acta Paediatrica Supplement 2006;450
- de Onis M, Onyango AW, Borghi E, Siyam A, Nishida C, Siekmann J. Development of a WHO growth reference for school-aged children and adolescents. Bulletin of the World Health Organization, 2007;85(9): 649-732.
- Must A, Dallal GE, Dietz WH. Reference data for obesity: 85th and 95th percentiles of body mass index (wt/ht²) and triceps skinfold thickness. American Journal of Clinical Nutrition 1991;53: 839-46.

United States Centers for Disease Control and prevention (CDC) 2000 growth reference

1. What is the size of the reference population and when were the data collected?

The CDC 2000 growth reference was developed using five national health examination surveys (the National Health Examination Survey (NHES) and the National Health and Nutrition Examination Survey (NHANES)) for girls and boys. Some limited supplementary information was collected from vital statistics on child birth weight, length, and head circumference sourced from birth certificates and hospital records (1963-1995).

2. What age range of children/ young people is covered?

2-20 years.

3. Where was the reference population sampled from?

USA population only.

4. What cut-offs are used?

The CDC 2000 growth reference defines children as at risk of overweight and obesity if their BMI exceeds the 85th and 95th centiles for most routine assessment. The 90th and 97th centiles are used for special health care requirements. The third and fifth centiles are used to define underweight status.

5. How are these thresholds used?

The CDC 2000 growth reference is primarily used in the United States.

6. Where can I find more information?

www.cdc.gov/nchs/data/series/sr_11/sr11_246.pdf

www.cdc.gov/growthcharts/cdc_charts.htm

Reader Information

Title	A simple guide to classifying body mass index in children
Author(s)	Hywell Dinsdale Caroline Ridler Louisa Ells
Publication date	June 2011
Target audience	Public Health Observatories Primary Care Trusts Local Authorities
Description	A simple guide on how body mass index (BMI) can be used to assess the weight status of children. This paper describes the different methods that can be used to interpret BMI in children and young people.
How to cite	Dinsdale H, Ridler C, Ells L J. A simple guide to classifying body mass index in children. Oxford: National Obesity Observatory, 2011.
Contact	National Obesity Observatory www.noo.org.uk ncmp@noo.org.uk
Electronic location	http://www.noo.org.uk/publications
Copyright	© National Obesity Observatory, 2011

National Obesity Observatory

DELIVERED BY



To the Planning Committee:

I wish to express my concerns and objections to proposed housing development near to Swinshall Hall in Loveclough.

I enclose my original objection sent to RBC Planning regarding the pre-planning application – I hope this and all other previous objections from residents will still be considered and not rejected on the grounds that the plans have been changed or given a new designation!

All my original points still stand – along with an invitation for any interested parties to look at the site from my address.

I would also like to underline the threat to wildlife, with video evidence of hedgehog and badger activity (the area was not called Badgercote for nothing) and evidence also of dunnocks (as in Dunnockshaw) and other nesting birds; as well as bats and – perhaps most important - newts.

I could see no evidence in the pre-planning application of any newt survey, which I believe is an essential requirement, to be undertaken in spring.

My original objection:

The southern part of the greenfield site specified in these documents directly adjoins my property at **36 Hameldon Road, Loveclough BB4 8RL** and I wish to express my concerns and oppose any future housing development.

Fundamentally, there is the fact that this is a greenfield site and building would have an adverse effect on 'visual amenity' of the area – woodland and grassland is still essentially the core character of the Rossendale Valley, where brownfield sites are, I believe, still available.

There is also the issue of adequate infrastructure, such as access to school places, doctors, dentists etc, as well as traffic issues on the already very busy Burnley Road.

But a key issue is the natural environment – any development would threaten the habitat of newts, which are evident near the watercourses near the southern end of the site.

I was surprised and delighted to discover newts when I started clearing my overgrown garden when I moved in last summer, but was not aware they might be in danger.

I did note from the documents that RBC would 'seek to avoid any harmful impacts of development on all aspects of Rossendale's natural environment - including its bio diversity, geo diversity and landscape assets, priority habitats and species.'

It goes on to say : 'Any application shall be accompanied by ecological assessments, species surveys and biodiversity calculations.' I trust this will be adhered to, especially regarding the newts, if RBC are minded to allow any development.

Part of this document says 'as would be expected with any development on a green field site at the edge of existing settlement, those locations immediately

adjacent . . . will experience large visual change.’

Very evident. Not, perhaps, grounds for me to object that my view is spoiled, but it does raise the issue of garden/bedroom privacy, especially if the planned homes are in excess of one storey – and bearing in mind that the nearby homes on Hameldon Road are all bungalows.

If RBC are indeed minded to approve any development, I would respectfully ask that there should be a substantial buffer zone and landscaping to the south of the site bordering Hameldon Road and this should be included in the site specific policy.

**** Please accept this addendum to my concerns and objection in my enclosed email dated 25/02/2021, which was sent at very short notice given the original deadline.**

I would like to draw attention to **Page 73** of Binder 1, which refers to a “Representative viewpoint” from Hameldon Road.

The views shown in the two photographs are hardly representative – it would, in fact, be difficult to find a viewpoint on Hameldon Road which is higher than, or more distant from, the proposed development site.

Members of the committee are more than welcome to visit my home at 36 Hameldon Road and view the site from there – and judge whether the visual effects would indeed be only “moderate.”

I applaud the idea of having a wild flower meadow, but would it not be worth creating this by using the rough pasture which already adjoins the popular park and leisure facilities to the south-west of the site, as well as adjoining the RBC-owned piece of land to the rear of bungalows on Hameldon Road?

There are constantly-used public footpaths across this land, along with natural watercourses and it is teeming with wildlife – many children, parents and walkers would be able to enjoy a meadow here all the more, rather than it being isolated in the centre of the site.

There is also a drystone wall, which although degraded, is a laudable feature of the landscape and part of the fabric of Rossendale’s image.

Yours faithfully

David Graham

British Guild of Travel Writers

National Union of Journalists Life Member

SilverTravelAdvisor.com

██████████ ██████████
████████████████████

Examination of the Rossendale Local Plan

EL12.002: Schedule of Proposed Main Modifications

Representations by A.G. Ashworth and R.W. Lester about RBC's Paper published on 3rd September 2021

Key Points

- 1) Consultation:** Seriously flawed, refer specifically to Paragraphs 1, 2, 3, 12.1 and 83.9 and generally to all other Policy comments.
- 2) Housing:** The target number should be reduced to 2,775 with a Plan date of 01.04.2022 to 31.03.37. Paragraphs 12.0 to 12.9.
- 3) Employment:** Requirement should be no more than 14ha. Paragraphs 29 to 32
- 4) Green Belt:** The following housing and employment sites should be removed from the Plan: H61, H62, NE1, NE2 & NE4. Paragraphs 13 to 17.
- 5) Housing Site H62:** Site should be removed from the Plan on the basis that there is an abundance of supply of housing land on non-Green Belt sites which creates a surplus of 3,535 homes. Paragraph 25.
- 6) Retail:** Comments on all policies some of which are unsound. Paragraphs 35 to 40.4.
- 7) Environmental Issues:** Provides evidence to support the removal of Site H62 from the Plan: massing & scale, safeguarding and enhancing historic environment, sympathy to existing occupiers, demonstrable harm and land stability. Paragraphs 41 to 43.
- 8) Monitoring:** Comments on policies, highlighting lack of targets and trigger points etc. Paragraphs 45 to 82.
- 9) Implications of NPPF 2021:** Highlights where the Plan is in conflict. Paragraphs 83 to 83.8.
- 10) Discrepancies between Table 7 in Policy H62 and Policies Map which render HS2 unsound.** Paragraph 84.
- 11) Latest Government statements:** No development on greenfield land. Unless allocations H61, H62, NE1, NE2 & NE4 are deleted, the Plan is unsound for failure to comply with emerging national planning policy. paragraph 85.
- 12) Lack of soundness.** An index to how the Main Modifications fail to ensure that the Plan is sound is at paragraph 86.

Examination of the Rossendale Local Plan

EL12.002: Schedule of Proposed Main Modifications

Representations by A.G. Ashworth and R.W. Lester about RBC's Paper published on 3rd September 2021

Representations

Introduction We make the following representations by reference to the page numbers of RBC's document EL12.002 and, where applicable, the reference numbers of the Proposed Main Modification (PMM) and Plan Policy.

1) Page 1: Paragraph 1 states that the Schedule sets out RBC's PMMs to the "Plan (Regulation 19) Publication Version - March 2019 (SD023)". This immediately presents a problem. Document SD023 is the Plan Pre-Submission Publication Version (Regulation 19 stage) Written Statement and is dated August 2018. The version of the Plan dated March 2019 is the Submission Version Written Statement, referenced SD001. We submit that the consultation is immediately and irredeemably flawed because it is completely unclear which document is being used as the basis for the PMMs.

2) Page 1: Paragraph 1 (continued). Paragraph 1 goes on to state that "This version consolidates and supersedes previous Schedules which the Council published before and during the Examination Hearing sessions.". It is unclear what is referred to here by "version". It would seem to refer to "Publication Version", but that makes no sense, because documents SD023 and SD001 were both published before the Examination began. If "version" means document EL12.002 itself, it should have itemised, by footnote or otherwise, the "previous Schedules" which have supposedly been consolidated and superseded. This lack of clarity also invalidates this consultation.

3) Page 1: Paragraph 2 states that RBC are at the same time consulting on Housing Update Paper (August 2021). That is contradicted by document EL12.001 Explanatory notes for the Consultation of *sic* the Schedule of Proposed Main Modifications, which lists five documents on which representations are invited and refers to the "Housing Update to 31 March 2021" as one of two "Evidence Documents, which may help to inform your response to the [PMMs]". There are two issues here:

- (i) Paragraph 2 deceives the public as to their entitlement to make representations about the Housing Update.
- (ii) It is unconscionable that as an evidence document the Housing Update is not allowed to be the subject of representations.

4) Page 5 MM001 Local Plan Objectives We welcome the inclusion of "Meeting housing and employment land needs in line with national policy whilst protecting the borough's natural and built environment". To give effect to this objective, the employment land requirement must be reduced to a figure based on evidence (no more than 14ha) rather than a vague desire for flexibility, and the allocations of Green Belt land for employment and of sites H61/H71 and H62/H72 (both being mainly

in Green Belt) must be deleted, as there is an adequate supply of land for these purposes without recourse to Green Belt.

5) Page 5 MM001 Local Plan Objectives In the first objective under the heading 'Economy' insert after "sites": excluding recourse to Green Belt land.

6) Page 6 MM001 Local Plan Objectives We welcome the inclusion of "Enhance the historic environment" and observe that the retention of allocation H62/H72 is inimical to enhancing the setting of Grade II*-listed Edenfield Parish Church. The allocation should therefore be deleted.

7) Page 6 MM001 Strategic Priorities After "Growth Corridor" insert: - without recourse to Green Belt land.

8) Page 6 MM001 Strategic Priorities It is not clear whether the substantial funding required for the projects identified for improving links to Greater Manchester would be available to RBC. Nor is it clear what effective support RBC could give to improving the M60 and M62, which are outside the Borough. Accordingly, it is unsound to include improving links to Greater Manchester as a strategic priority in the Plan, when there is no evidence that they are within RBC's power to achieve.

9) Page 7 MM001 The Spatial Strategy Including sites presently in Green Belt for development because of their strategic value is contrary to the reasons for designating the land as Green Belt in the first place. Given that there is sufficient alternative land available for housing and employment purposes, exceptional circumstances justifying the release of Green Belt do not exist. The Spatial Strategy is flawed because it does not prioritise protection of the Green Belt, and the Plan is therefore unsound.

10) Pages 10-12 MM001 Table 1: Settlement Hierarchy Spelling error and numerical inconsistencies require correction. The references to A1 retail are obsolete.

11) Page 11: MM001 Urban Local Service Centres. Page 9 distinguishes between Urban Local service Centres (urban in character) and Rural Local Service Centres (in more rural locations). On the basis of location, Edenfield should clearly be treated as a Rural Local Service Centre. This is a deliberate attempt by RBC to support the disproportionate amount of development proposed in Edenfield compared with the remainder of the Borough. **(Edenfield 50%, remainder of Borough 10 %.)**

12) Page 14: Key Topics: Housing: We take issue with the calculation of the new requirement of 3,191 new homes over the Plan period 2019-2036 and dispute that there has been adequate consultation on the extension of the Plan period from 2019-2034. We refer to document EL 12.007 Housing Update August 2021 and comment as follows (NOTE: references in [blue](#) are to document EL12.007):

12.1) Page 3 Paragraphs 1.1 - 1.2: RBC state: *"1.1 This note provides an updated position for the revised Local Housing Need (LHN) as of 2021, supply and completion data and trajectories up to 2036. The option to extend the Local Plan period to 2036 has now been consulted on and recommended as appropriate in the June 2021 Post Hearing Letter (PHL) from the Planning Inspectors that examined the Local Plan. [Our emphasis] This means the Local Plan will now look forward to 15 years from the intended date of adoption in December 2021."*

We respectfully challenge the Inspectors' decision to approve the extension of the Plan at this late stage as well as RBC's claim that it has been consulted upon, when in reality there has been inadequate consultation for such a major change.

RBC published their EL 10.001 and EL10.002 documents on 2nd June 2021, the respondents were given a deadline of 16th June, and the Inspectors issued their Post Hearing Letter on 30th June, published on 5th July.

RBC described that consultation as ‘technical’, and their email of 2nd June implied that it concerned primarily the housing need figure and employment land requirement. They did not flag up that they were proposing a 2-year extension to the plan period, which was obviously more than a technical point. As such it should have been better publicised and the consultation period should have been at least six weeks. RBC therefore cannot now claim that the plan period extension has been the subject of meaningful consultation.

The extension of the Plan period by two years is a major change which we believe RBC deliberately introduced to continue their attempted justification of the use of Green Belt land, particularly the H62/H72 allocation. The two years’ extra requirement at 185 dwellings *per annum* (dpa) equates to 370 homes, almost identical to the 390 homes proposed for H62/H72. Without this change H62/H72 would have had to be excluded.

It is outrageous that RBC, after disregarding several sources of supply capable of providing an additional 3,535 homes, are at this late stage continuing to ‘manipulate’ the Plan, this time by extending the period.

12.2) Page 3 Paragraphs 1.1 – 1.2 and 2.1 - 2.3: If the intended date for adoption of the Plan is December 2021 it is not appropriate to take 1st April 2021 as the start date. The Plan should commence no earlier than 1st April 2022. We referred to this in our response to EL 10.001 (EL10.003 at pages 72 and 73) - please see Paragraphs 1.1 to 1.8 thereof for supporting comments which we reproduce here for ease of reference:

1. Planning for the past

1.1 It is a contradiction in terms, indeed an impossibility, to plan for the past, but RBC are asking us to suspend disbelief while they attempt to do just that. In June 2021 we are being invited to comment on a Plan including a two-year period that ended on 31st March 2021.

1.2 It is over two years since the Plan was submitted for examination. Local housing need (LHN) calculated using the standard method may not be relied upon more than two years after a Plan is submitted. This is the first time that a Plan submitted under the revised NPPF has faced this issue, and being a pioneer in this respect is not a badge that RBC can wear with pride. This regrettable situation is due to the facts that

(i) the Plan was submitted less than a week before the Plan period began,

(ii) it was in such poor shape that the Inspectors had to call for a large amount of additional information,

(iii) there was considerable delay in providing that information, and

(iv) all those matters were, or should have been, under the control of RBC.

1.3 RBC have been asked “to provide a revised calculation of LHN for the current year” and “to consider what implications this may have on the housing requirement in Policy HS1”.

1.4 Accordingly, RBC have recalculated the LHN as 185 dwellings per annum (dpa). However, as well as specifying that figure for the current and subsequent years, RBC seek to add to the housing requirement the shortfall in the delivery of the requirement proposed for the first two years, indeed the lost years, of the Plan.

1.5 We submit that that is wrong. It is wrong because, if the Plan were being prepared afresh, it would not have to add in the shortfall in previous years' delivery under the Core Strategy. All it would have to do would be to ensure a 20% buffer of deliverable sites in the first five years. It is wrong for a Plan that is being patched up on the hoof, as this one is, to use a different methodology and set a different requirement from a clean Plan being made today.

1.6 It is wrong also because it is not possible to plan for the past. The requirement of 208 dpa was never established in an adopted plan and cannot be retrospectively asserted now as the figure to be applied for the two-year period that ended on 31st March 2021.

1.7 We therefore disagree fundamentally with paragraphs 3.6 to 3.13 on pages 4 and 5 of the Update, and paragraphs 6.2 and 6.3 on page 10, to the extent that they include a requirement of 208 dpa in the years beginning 1st April 2019 and 1st April 2020, and with the addition of 245 dwellings (the shortfall in delivery between 1st April 2019 and 31st March 2021) to the housing requirement in paragraphs 6.6 and 6.7 and Table 6 of the Update (pages 11 and 12).

1.8 We note the Inspectors' wish to deal with the issue in a pragmatic manner, and, whilst not wanting to fall into the trap of the sunk costs fallacy, we are conscious of the time and effort that all parties have devoted to the Examination so far. Now that the need to recalculate the LHN has arisen, we submit that it is necessary to reset the Plan Period, which should begin no earlier than 1st April 2022.

12.3) Page 4 Paragraph 4.1: Annual and Overall Housing Land Supply: Table 1 Annual and Overall Housing requirement for the period 2022-2037 should be amended as follows:

Local Plan Period 2022-2037	Annual Housing Requirement Years 1-5	Annual Housing Requirement Years 6-10	Annual Housing Requirement Years 11-15	Overall Housing Requirement
15 years	185	185	185	2775

12.4) Page 5 Paragraphs 5.1 and 5.2: Housing Land Supply: Small Sites Allowance:

The Small Sites allowance at 19 per annum cannot be justified; the figure should be realistic, not one deliberately downgraded to mask availability. ECNF submitted a full justification for 25 dpa, refer to EL 10.003 at page 85 for the detail. Table 2 in Paragraph 5.2 is unacceptable. The proper course would be to examine the most recent figures, and looking further back than ten years is not helpful, particularly as the 2010/11 figure is an obvious outlier. The figure for 2019/20 should be 33 - for some reason 2019/0348 was omitted - and the figure for 2020/21 should be 23 according to the Completion Report. If the figure for 2010/11 were omitted as it should be and the corrections made, the average would become 23. Note the trend is for this source to increase and, if the last five years

are taken, the average is 26 dpa. Approvals for 2021/22 up until mid September are already 22. For present purposes there seems to be no merit in excluding garden sites from the calculations.

There is also reference in Table 2 to the percentage the Small Sites contribute. Again, if the corrections are made to the Table, the result is in excess of 15% which equates to 416 dwellings based on the 2,775 giving 27.7 dpa.

12.5) Page 6 Paragraph 5.3: Overall Land Supply from 2022/3 to 2036/7. We have cross-checked the sources of supply from the Housing Trajectory on Page 8 in Table 7 of RBC’s document EL 12.007 and then included some of the other sources of supply that RBC have omitted. The corrected data for Table 3 for 2022-2037 are as follows:

Source of Supply	Totals
Remaining Dwellings on Housing Allocation Sites	1674
Remaining Dwellings on Committed Site List with Planning Permission.	922
Small Site Allowance at 19dpa for 13 years	247
Sub Total	2843
Addition for Realistic Small Site Allowance from 19 to 25dpa for 13 years	78
PLANNING Approvals from 01.04.21-25.09.21	22
Sub Total	2943
Empty Homes: Refer to ECNF -EL 10.001 Page 5 Paragraph 3 & ECNF – EL 8.019.7. 10 per annum for 15 years as per RBC proposal.	150
Town Centre Regeneration: Refer to ECNF -EL 10.001 Page 5 Paragraph 4 & ECNF – EL 8.019.6 A minimum of 9 per annum for 13 years as per RBC proposal.	117
Grand Total	3210

12.6) Page 6 Paragraph 5.4: The overall land supply is compared to the housing requirement below:

Table 4 should be amended as follows:

Local Plan Period	Overall Housing requirement	Overall Housing Supply	Shortfall (-) / Surplus (+) requirement
2022 - 2037 (15 years)	15 x 185 = 2775	3210	+435

12.7) Other sources from non Green Belt Sites disregarded by RBC/ Inspectors:

Source	Numbers
Reasonable Alternative Sites: 58 sites approved by Local Chartered Town planning Expert	2760
Windfalls***: Minimum of 20 dpa: Refer to ECNF -EL 10.001 Page 6 Paragraphs 6.1 – 6.9 and Appendix 5.	240
Re-Allocation of Old Factories no longer fit for Employment Purposes. 100+	100
Total available from other non-Green Belt Sources.	3100
Overall Surplus	3535

*** RBC continues to exclude Windfalls which have traditionally provided a very valuable source of supply and this makes no sense whatsoever. If a site has the capacity for less than 5 homes then it is termed a small site, 5 or over are termed windfall sites, how can the former be included and the latter excluded?

The other sources of supply despite RBC having agreed to include some of them after the Examination Hearing are again being disregarded for no apparent reason despite ECNF highlighting them at every stage of the Plan’s progress.

There can be no exceptional circumstances to justify the inclusion of H62/H72 when there is an oversupply of 435 homes without these other sources and an oversupply of 3,535 homes if the other sources are included. Please refer to paragraph 12.9 below for source detail.

12.8) Pages 6 to 8 The Five Year Land Supply: RBC never fail to disappoint!: In March 2021 they published on their website their Annual Five Year Housing Land Supply Report for 2020/1 to 2024/5. Subsequently the version of that Report on the website showed it as having been published in July 2021. Both versions stated that there was not enough housing land to provide five years’ supply.

In correspondence lasting from April 2021 to July ECNF challenged this with both the Planning Manager and the CEO Mr. Neil Shaw. We pointed out the many errors in the Report, not least the fact that the maximum supply they quoted was 4.3 years with a range of 2 to 4.3 years when our calculation showed 7.98 years of supply. We requested them to issue errata but they refused.

One month later in August 2021 they produced the Five Year Housing Land Supply Report for 2021/22 – 2025/6 and within one month they had increased the range from 4.38 to 10.4 years with 8.2 being the Local Plan Consultation, 7.33 being the Emerging Local Plan which in a maximum of 31 days had increased from 3.5 years. They can have no credibility left and at the very kindest be described as ‘Not fit for purpose with questionable integrity’.

The key points here are that the removal of Site H62/H72 without any other change would only reduce the supply to 7.76 years from 8.2 and that, if the backlog were excluded, it would increase the supply to 9.9 years. In other words, the removal of site H62/H72 is not an issue.

Conclusion: With the lack of any evidence of exceptional circumstances justifying recourse to Green Belt land for development and the abundant over-supply of housing land and the serious constraints relating to Site H62/H72 there can be no justification for the continued inclusion of this site.

12.9) Housing Supply: Updated version of RBC's Summary Data Table 7 on Page 8 In EL 12.007 based on an amended start date of 1st April 2022.

Period	RBC Total	Housing Allocation	Planning Approvals	Small Site Allowance	Totals	Comments
2022/3	446	161	285	0	468	22 Approvals from S. Sites in first half of 2021/2.
2023/4	571	256	315	0	571	
2024/5	651	458	174	19	651	
2025/6	471	311	141	19	471	
2026/7	187	168	0	19	187	
2027/8	143	124	0	19	143	
2028/9	100	74	7	19	100	
2029/30	68	49		19	68	
2030/1	67	48		19	67	
2031/2	24	5		19	24	
2032/3	30	11		19	30	
2033/4	28	9		19	28	
2034/5	19			19	19	
2035/6	19			19	19	
2036/7				19	19	19 Extra Year
	2824	1674	922	269	2865	
Surplus	49				90	Requirement of 2775
Small Site Extra Allowance of 6 dpa.				Surplus	168	78
Contribution from Empty Homes				Surplus	318	150
Contribution Town Centre Regeneration				Surplus	435	117

Conclusion : With a realistic Small Sites contribution and contributions from Empty Homes and Town Centre Regeneration previously agreed by RBC, there is a surplus of 435. With this surplus there can be no exceptional circumstance to release undeveloped land from Green Belt; consequently H62/ H72 should be removed from the Plan.

13) Page 15 Key Topics: Green Belt: RBC state “Strategic Green Belt releases for housing are proposed in Edenfield. The development in Edenfield creates the opportunity to masterplan a **substantial new addition to the village that would have limited impact on the openness of the Green Belt**”. [Our emphasis]

RBC have from the outset of the Plan process deliberately failed to recognise reality - their own Landscape Architects Consultants Penny Bennett stated in both 2015 and 2017 “ *The greater part of this site, Area A is unsuitable for development, because the effects on the landscape would be significant, and would be uncharacteristic for the local landscape character area, 8b Irwell Valley south. Nor could it be effectively mitigated against because of the sites openness. Long views west from [Market Street] and eastwards from the far side of the valley would be affected and there would be significant adverse effects on attractive well used walks in the area.*”

RBC followed their usual strategy when their Consultant does not provide the response they require, they employ an alternative Consultant who ‘toes their line ‘and is no doubt grateful for the business. We have commented many times on their alternative **Consultants’ report in this case, it is seriously flawed and does not stand up to scrutiny. Refer also to EL 12.003 for further comments on this at Pages 2 and 3, Paragraphs 5, 8 and 9.**

The comment relating to the opportunity to masterplan the site is hailed by RBC as a positive benefit, almost an exceptional circumstance, however it is irrelevant when their policy for all sites for more than 50 homes also requires a masterplan.

One other point with respect to this important open area is that it provides a definite break from the urban sprawl of Greater Manchester and is a beautiful gateway to the Rossendale Valley. Its development would represent a serious detriment to the openness of the Green Belt. Releasing it from Green Belt does nothing for urban regeneration, as it discourages the recycling of derelict and other urban land.

14) Page 15 Key Topics: Employment Land: RBC claim that their objectively assessed need remains at 27ha despite the fully supported claims by Edenfield Community Neighbourhood Forum (ECNF) that they only need between 8 and 12 ha and their own consultants’ recent reassessment of 14ha. It is clear that RBC have inflated the employment land requirement without clear evidence. The proposals wrongly place market demand above the importance of preserving the Green Belt. The claimed evidence of intention of the owners of the Green Belt sites to develop them for business purposes was insubstantial (refer to our comments in our response to Actions 15.1, 15.2 etc. EL9.006 at pages 819 to 822). Surrendering to perceived market demand and releasing Green Belt sites in the A56 corridor runs completely against purposes c) and e) of the Green Belt, namely, to assist in safeguarding the countryside from encroachment, and to assist in urban regeneration by encouraging the recycling of derelict and other urban land. As repeatedly submitted by ECNF, there are no exceptions circumstances to justify these releases of Green belt, and the plan is therefore unsound for failure to comply with national planning policy.

15) Pages 20 and 21: Spatial Strategy - Explanation MM002: RBC state “As well as extending the urban boundary into the designated countryside to identify additional new sites, the Green Belt has also had to have been considered. The loss of existing Green Belt land has been minimised but **there are exceptional circumstances to justify some Green Belt release on greenfield sites**, [our emphasis] given the overall imperative to identify sites that can deliver the Borough’s future needs. This applies to new employment sites, which need to be in areas with good access to the strategic road network, which is where businesses want to be.”

We would repeat our comments about page 15 made at paragraph 14 above.

RBC continue: “The Borough’s largest housing allocation at Edenfield (H62) for 400 new houses is located on the former Green Belt land, which has good accessibility. The scale of the site to the west of Market Street means that this allocation will contribute significantly to housing provision, including affordable tenures, in Rossendale.

The strategic release of the land identified for allocation will be contained by a strong boundary (the A56), so limiting the potential for future urban sprawl. This will be perceived as the main block of settlement within Edenfield, growing incrementally north and will fill the gap between the A56 and the linear settlement along Market Street to create a stronger Green Belt boundary and settlement edge”.

It is difficult to comprehend how RBC can claim there are “exceptional circumstances” to include Site H62/H72 which is in the Green Belt when they are fully aware from our previous submissions (most recently our response to EL 10.001 - refer to EL10.003, pages 70 to 98) that there is a surplus of supply available on non-Green Belt Land. Please refer to paragraphs 12.3 to 12.9 above for full details.

RBC also claim this site will provide affordable tenures. It is not clear how they can claim this when they are also claiming housing values in this area are the highest in the Borough. Furthermore, it is no more than an assumption without basis, because, as well as the need to contribute to highway alterations, educational provision, compensatory improvements in the Green Belt, open space, playing pitch provision etc, developers would also face abnormal costs of problematic and unstable ground conditions, meaning that, as the developers of site H64/H74 have done, developers here are likely to claim it is not viable to provide affordable housing.

Whilst the existing Green Belt boundary to the west of Market Street and Blackburn Road is not a straight line, it is erroneous to suppose that it is not strong or clearly defined. The existing boundary must be maintained to prevent any urban sprawl. The inclusion of H62/H72 does not create a stronger Green Belt boundary or limit the potential for urban sprawl. It exacerbates the existing sprawl and devalues the gateway to the Rossendale Valley.

Another groundless assumption is “growing incrementally north”. From the Examination it would appear that the owners of the central portion of H62/H72 are the most likely to begin development.

RBC continue: “Some smaller housing sites have been allocated on land released from the Green Belt but only where the land is previously developed.” That is incorrect. Site H61/H71 has been asserted to have been previously developed, but it has not. Please refer to EL9.006 at page 717.

RBC continue: *“In keeping with the priority to protect Green Belt and take forward robust boundaries for the future, only major schemes that will contribute significantly to meeting the Borough’s needs for employment and housing, that have a strategic role, have been identified on Green Belt.”*

Again, this is simply incorrect. H61/H71 is a Green Belt site, not previously developed, but is certainly not a major scheme, contributing only nine dwellings.

At the same time RBC are still excluding the older employment sites that are no longer fit for employment purposes from being made available for residential purposes.

The numerous flaws in the Explanation reflect the faults in the Spatial Strategy and in the allocations of undeveloped Green Belt sites.

16) Page 22 MM04 Strategic Policy SD2: Urban Boundary and Green Belt. RBC state: *“All new development in the Borough will take place within the Urban Boundaries, defined on the Policies Map, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area. Land has been removed from Green Belt in the following locations on the basis that exceptional circumstances exist: [H60/H61/H62/H63 NE1/NE2/NE4]”.*

Again they do not provide details of the exceptional circumstances, they just state there are some, when in reality there are, as regards H61, H62, NE1, NE2 and NE4, none to justify the removal of land from the Green Belt. Unless allocations H61, H62, NE1, NE2 and NE4 are deleted, there is insufficient evidence to support Policy SD2, which is thereby unsound.

Strategic Policy SD2 is in conflict with Strategic Policy ENV2 in so far as it allocates site H62/H72 - refer to paragraph 42 below. That conflict should be resolved by deleting the allocation. Otherwise the Plan is unsound.

17) Page 23 MM04 Strategic Policy SD2: Urban Boundary and Green Belt. In passing, we note that the amendment to the first sentence on page 23 does not read well.

18) Pages 23 and 24 MM05 Policy SD4 Green Belt Compensatory Measures The first, second, third and sixth bullets should each be qualified by the addition of “provided that the project is located within Green Belt”. The fifth bullet should be deleted, as it is absurd to class a school extension as an improvement to the Green Belt, and if the extension does impinge on Green Belt, it needs to generate its own mitigation. Without those amendments the Policy will be unsound for failure to comply with NPPF, paragraph 142.

19) Page 24 MM005 Policy SD4 Green Belt Compensatory Measures - Explanation: RBC state: *“Exceptional circumstances exist within Rossendale to release land from the Green belt sic for the development of additional new housing and employment land. However, in developing on such land developers must provide compensatory improvements to the remaining Green Belt that will help to mitigate the loss of the Green Belt for existing residents.”*

If, but only if, the words “in Rossendale” are replaced by “in the case of H60 Irwell Vale Mill and H63 Edenwood Mill, Edenfield” and the words “and employment” are deleted, the first sentence quoted would be correct, albeit clumsily worded.

The Green Belt is a benefit to the nation, not just residents. The words “for existing residents” do not appear in NPPF paragraph 142, are simply confusing and should be deleted.

There is no national policy justification for limiting the location of the improvements. The priority should be the securing the greatest improvement, not its location.

20) Pages 25 and 26 MM006 Policy HS1 and Explanation: Meeting Rossendale's Housing Requirement. RBC claim amended number is 3,191 with 456 in the ECNF area.

We have challenged these numbers in our response to EL 10.001 (refer to EL10.003, pages 70 to 98) and Paragraphs 12.1 to 12.9 in this report and the target number of 3,191 should be 2,775. The Plan period should be for 15 years beginning in 2022.

RBC claim the total number for the Edenfield Neighbourhood Area is 456, however when the 15 small and windfall sites either completed or with planning permission in the ECNF area are included, that number rises to 471. Please refer to the ECNF response to EL 10.001 (EL10.003, pages 70 to 98) and to paragraphs 12.1 to 12.9 above.

21) Pages 26 to 30: MM007: Five Year Housing Supply. We note RBC now accept they have over 8 years supply available for the first 5 years of the Plan as we claimed in our response to EL 10.001 (refer to EL10.003, pages 70 to 98), and they would still have 7.8 years supply when site H62/H72 is removed. However, the calculation should, as explained at paragraphs 12.1 to 12.9 above, be on the basis of a 15-year period beginning no earlier than 1st April 2022 with a requirement of 185 dwellings per annum and no allowance for shortfall in past years save for a 20% buffer in the first five years. We have demonstrated above that RBC will still have five years' housing land supply after deletion of allocations H61/H71 and H62/H72.

22) Pages 30 to 37 MM008: Policy HS2: Housing Site Allocations. We have challenged the RBC claim that they have a slight shortfall against their target and provided the supporting evidence in Paragraphs 12.3 to 12.7 of this response. In reality they have twice as many dwellings as they require but they continue to disregard several sources and under-estimate others. **Refer again to Paragraphs 12.3 to 12.9 above.** Allocations H61/H71 and H62/H72 should be deleted.

The allocation of site H62/H72 in Policy HS2 is inconsistent with Policy ENV3 Landscape Character and Quality - refer to paragraph 43 below.

Strategic Policy ENV2 is in conflict with Strategic Policy SD2 Urban Boundary and Green Belt and Policy HS2 in so far as the latter two policies allocate site H62/H72 - refer to paragraph 42 below. That conflict should be resolved by deleting the allocation. Otherwise the Plan is unsound.

23) Page 38 MM008 Explanation of Policy HS2 Housing Site Allocations. The Plan should be for a 15-year period beginning no earlier than 1st April 2022.

24) Pages 67 and 68 MM009: Housing Site Specific Policies: H61 Land east of Market Street, Edenfield. This allocation should be deleted as it has proceeded on the erroneous assumption that the site is previously developed land (refer to EL9.006 at page 717) and because there is no need to have recourse to Green Belt.

In the Explanation the reference to 'Recreation area and Playground' should be deleted, as these are not in the Green Belt. The reference to schools should be deleted as these are not in Green Belt, and, if they were to be extended into the Green Belt, any such extension should be accompanied by its own liability to make compensatory improvements in the remaining Green Belt. Improvements to the Recreation area, Playground or the Schools would not satisfy NPPF paragraph 142.

25) Pages 68 to 72 MM009: Housing Site Specific Policies: H62 Land west of Market Street, Edenfield.

This allocation should be deleted as there is no need to have recourse to Green Belt and the site itself is unsuitable for development for reasons submitted previously.

“Development for approximately 400 houses would be supported provided that:

1. The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing;” All sites over 50 dwellings are required to have a Masterplan.

“2. The development is implemented in accordance with an agreed design code;

3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. In particular:

i. safe vehicular access points to the site are achieved from the field adjacent to no. 5 Blackburn Road and from the field opposite nos. 88 – 116 Market Street. Full details of access, including the number of access points, will be determined through the Transport Assessment work and agreed with the Local Highway Authority;

ii. agree suitable mitigation measures in respect of the capacity of Market Street to accommodate additional traffic. Improvements will be needed to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rawstron Arms. Measures to assist pedestrian and vulnerable road users will be required;”

“provided that . . . agree suitable mitigation measures” does not make sense. There is no ‘Rawstron Arms’ in Edenfield. ECNF have supplied a Transport Study (EL9.006 at pages 733 to 817) which highlights all the serious issues that have still not been addressed. This is just another example of RBC ‘kicking the can down the road’ rather than doing the right thing and removing the site from the Plan. Unless and until the site promoters produce a detailed study, approved by the highway authority, showing how site access will be achieved, any proposed prohibition of waiting on the B6527 and measures to accommodate additional traffic and assist road users, it is wrong to allocate the site for housing.

“4. A Heritage Statement and Impact Assessment is provided and suitable mitigation measures are identified and secured to conserve, and where possible, enhance the setting of the Church, the non-designated heritage assets which include Chatterton Hey (Heaton House), Mushroom House, and the former Vicarage, and the other designated and non-designated heritage assets in the area; “

This is pure lip service, RBC’s Heritage initial comments were that no building should take place north of Mushroom House. As RBC’s standard practice, when this was a problem a new Consultant was used. This supposed protection is very weak. Whilst describing the non-designated heritage assets as such, the wording downplays the Church’s importance by neglecting to mention that it is actually Grade II*-listed.

“5. Specific criteria for the design and layout needs [plural subject - verb must be corrected to ‘need’] to take account of:

- i. Retention and strengthening of the woodland enclosures to the north and south of the Church*
- ii. The layout of the housing parcels should be designed to allow views to the Church to continue*
- iii. The relationship of the new dwellings to the Recreation Ground to ensure safe non-vehicular access is provided*
- iv. Public open space to be provided along the woodland area south of the brook/Church enclosure*
- v. Landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development and provide a buffer to the new Green Belt boundary*
- vi. Materials and boundary treatments should reflect the local context"*

Clauses ii, v and vi do not follow on from "take account of".

"6. An Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts particularly on the Woodland Network and stepping stone habitat located within the site.

7. Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4

8. Geotechnical investigations will be required to confirm land stability and protection of the A56, and consideration paid to the suitability or not of sustainable drainage systems on the boundary adjoining the A56"

When the Clod Lane/Manchester Road site has been removed from the housing trajectory for geotechnical reasons and Highways England have already stated the same fault is inherent in Parcel A of H62/H72, how can this site still be in the Plan? Additionally, Parcel A has a man-made mound of laminated clay which is tipped on laminated clay creating even more dangerous substrata than at Clod Lane.

"9. Provision will be required to expand either Edenfield CE Primary School or Stubbins Primary School from a 1 form entry to a 1.5 form entry primary school, and for a secondary school contribution subject to the Education Authority. Land to the rear of Edenfield CE Primary School which may be suitable is shown on the Policies Map as 'Potential School and Playing Field Extension'. Any proposals to extend the schools into the Green Belt would need to be justified under very special circumstances and the provisions of paragraph 144 of the NPPF."

NPPF paragraph 144 has nothing to do with proposals affecting the Green Belt and is therefore irrelevant.

ECNF have highlighted many times that there is already chaos and serious traffic disruption at Edenfield School which has no drop off or pick-up point and to increase the pupil numbers by 80% is just unacceptable.

There has been no clarity from the local education authority about how they would address the increased demand for primary school places - it appears that 148 extra primary school places would be required. Edenfield School's present nominal capacity is 175. Please refer to ECNF's re-

sponse (EL9.006 at page 718) to RBC's paper about Actions 14.1 to 14.4. Amid such uncertainty it is wrong to allocate the site for housing.

"10. Noise and air quality impacts will need to be investigated and necessary mitigation measures secured;" ECNF have highlighted the pollution issues with respect to light, noise and air pollution associated with this site which will be exacerbated if the A56 is extended to a three lane highway, possibly in the early 2030s.

"11. Consideration should be given to any potential future road widening on the amenity of any dwellings facing the A56."

A serious omission is a requirement for a geotechnical assessment of the effects of the proposed development on buildings adjacent to the site. This is necessary because of the known geological problems. This information should be provided before the site is considered for allocation.

"Explanation

Exceptional circumstances have been demonstrated to support the release of this land lying between the A56 and Market Street in Edenfield from the Green Belt. The area is very open in character and allows views of the surrounding hills and moors and will require a well-designed scheme that responds to the site's context, makes the most of the environmental, heritage and leisure assets, and delivers the necessary sustainability, transport, connectivity, accessibility (including public transport) and infrastructure requirements."

Again, RBC are claiming that exceptional circumstances have been demonstrated to support the release of this land but yet again they fail to say what they are. With all the alternative sources of supply and the severe constraints associated with this site there can be no exceptional circumstances for its inclusion.

"Rossendale Council therefore requires a Masterplan and will work in partnership with key landowners and key stakeholders, including the Edenfield Community Forum, to ensure a Masterplan is prepared." All sites over 50 dwellings require a Masterplan and, try as RBC may, this in itself does not qualify as an exceptional circumstance.

"Edenfield Parish Church is Grade II and development would have to consider the effect of the development on the significance of the heritage asset and should safeguard the setting of the designated heritage asset located within close proximity to the site allocation. There are several non-designated heritage assets located within close proximity of the site allocation and other designated and non-designated heritage assets located in the area. Development would have to consider the effect of the development on the significance of these heritage assets and should safeguard the setting of the heritage assets." Please refer to comments at paragraph 42 below.*

"Sensitive landscaping using native species will be required in order to provide a suitable buffer to the new Green Belt boundary. Any biodiversity improvements should be directed to this landscaped area as well as to the mature woodland, identified as a stepping stone habitat.

Due to the removal of the site from Green Belt it is necessary that there are compensatory improvements to the Green Belt within the local area in accordance with SD4 in particular these should relate to proposals identified at Edenfield Cricket Club, the Recreation Area and Playground, and Edenfield and Stubbins Schools. Compensatory measures could also be directed towards footpath and cycleway

improvements *in the Green Belt* in the vicinity as set out in the Council's Green Belt Compensation Document." The reference to 'Recreation Area and Playground' should be deleted, as these are not in the Green Belt.

The reference to schools should be deleted as these are not in Green Belt, and, if they were to be extended into Green Belt, any such extension should be accompanied by its own liability to make compensatory improvements in the remaining Green Belt.

The words in orange need to be added.

Improvements outside the Green Belt would not satisfy NPPF paragraph 42.

It is not clear whether the Green Belt Compensation Document is a Supplementary Planning Document or what, or whether, as the Explanation wording requires, it will be published before the Plan is adopted.

"Any proposed development must make a positive contribution to the local environment and consider the site's form and character, reflecting the setting of features such as the Grade II Listed Edenfield Parish Church and incorporating appropriate mitigation. Development must be of a high quality design using construction methods and materials that make a positive contribution to design quality, character and appearance. The development must contribute towards the sustainable use of resources. Implementation of development must be in accordance with an agreed Design Code/Masterplan across the whole development. The layout should be designed to allow glimpsed views towards the Church to continue, for example, by aligning the principle road(s) along a north-south or north east – south west axis, and building heights restricted."* **After "towards the Church" should be inserted: and from the Churchyard. The spelling "principle" is inapposite.**

"In light of the site's natural features and relationship to surrounding uses, development is likely to come forward in a number of distinct phases. The infrastructure associated with the overall development and each individual phase will be subject to the production of a phasing and infrastructure delivery schedule to be contained in the Masterplan. Site access will be a key consideration" **Site access needs to be resolved before the site is considered for allocation - refer to Transport Study (EL9.006 at pages 733 to 817).**

"Development proposals will be subject to a Scoping Study, a Transport Assessment and Travel Plan. This must be agreed with Lancashire County Council. Appropriate measures must be put in place to address any impacts the development may have on the strategic and local road networks. A Travel Plan will seek to ensure that the development promotes the use of public transport, walking and cycling." **If a Scoping Study and Travel Plan and measures addressing the impacts on the road networks beyond Market Street are required, they should be specified among the numbered paragraphs of this site-specific policy and not just in the Explanation. It is unclear whether it is the Study, Assessment or Plan that has to be agreed with LCC, and also unclear are the juncture at which that agreed document must be achieved and the time when measures addressing the impacts on the road networks must be implemented. The reality is that the Transport Assessment and the road impact measures need to be identified before the site is considered for allocation, as these have a crucial bearing on the suitability of the allocation.**

"A Health Impact Assessment will be required to maximise the overall benefits of the scheme to intended residents." **If so, it should be specified among the numbered paragraphs of this site-specific**

ic policy and not just in the Explanation. The time when the Assessment is required should be stated.

“An Appropriate Assessment under the Conservation of Species and Habitats should be undertaken to address any impact on the Breeding Bird Assemblage for the South Pennine Moors.” **If so, it should be specified among the numbered paragraphs of this site-specific policy and not just in the Explanation. The time when the Assessment is required should be stated.**

“A geotechnical study will need to confirm that there will be no adverse impacts on the A56. The suitability of providing a Sustainable Drainage System will need to be considered too as Highways England consider that storing water on site may not be advisable. Highways England may wish to widen the A56 and further discussions with Highways England are advised and if this is possible, this should be addressed by a suitable site layout plan to address this.” **It is unclear why the words “if this is possible” are included, given that the site-specific policy 1 requires a masterplan for the comprehensive development of the whole site. The words “to address this” are superfluous.**

“Edenfield Primary School is operating close to capacity and there is no capacity at Stubbins Primary School. The preferred course of action of the Education Authority would be to expand Edenfield CE Primary School onto adjacent land to the rear, provided that any access issues can be overcome, or at Stubbins Primary School.” **Please refer to comments on pages 14 and 15 above about educational provision.**

26) Pages 72 to 74: MM009: Housing Site Specific Policies: H63 Edenwood Mill, Edenfield
The reference to the Recreation Ground should be deleted, as it is not in the Green Belt.

Improvements outside the Green Belt would not satisfy NPPF paragraph 142.

27) Pages 92 and 93: MM014 Policy HS4 Housing Density

This Policy and Explanation are badly composed. If, as the Explanation states, higher densities will be expected on sites within the urban boundary and reasonable walking distance of a bus stop on a key transport corridor, that should be in the Policy itself.

There is conflict between this Policy and Strategic Policy ENV1, which the PMMs fail to resolve. Accordingly the Plan is unsound through being uncertain and self-contradictory.

To avoid uncertainty all the key corridors should be listed. Giving examples is not sufficient.

If the Bury Road/Burnley Road/Market Street section of the 481/483 bus route is a key transport corridor, as it surely must be if the key corridors are not limited to the 464 and X43 routes, then Policy HS4 would seem to require a density in excess of 40 dwellings per hectare on sites H61 and H62, but this is in conflict with Policy HS2, which contemplates a density of 29 dwellings per hectare on sites H61 and H62. This inter-Policy conflict renders the Plan unsound.

28) Pages 108 to 111: MM026: Strategic Policy EMP1: Employment: RBC are continuing to claim their requirement is 27ha despite Lichfields’ review identifying the need at 14ha. ECNF have challenged the 27ha figure from the outset following the publication of the Submission Version of the Plan and submitted evidence throughout the process that supports only 10ha. **Refer to ECNF – EL**

10.002 (EL10.003 pages 99 to 113) for supporting evidence. There is no up-to-date solid evidential base for the figure of 27ha. Without such a base, inclusion of that figure renders the Plan unsound.

It is wrong for the Plan to make revision for the years that have passed. The Plan should provide for a period of 15 years beginning no earlier than 1st April 2022.

ECNF have also highlighted the inaccuracies of the Employment Land data with many large, medium and small sites that have been omitted, some or all of which could have spare land available for expansion. However, in their wisdom RBC just disregarded the comments and took no corrective action.

RBC rightly highlight the following; *“Of the existing employment sites that are to be retained, the study notes that much of this committed supply is of poor quality, nor located where market demand is greatest.”*

They do not however propose to allow this land to be reallocated for other purposes including housing despite identifying in excess of 31ha for employment and proposing to allow employment in non-designated areas.

29) Pages 111 to 121: MM027 Policy EMP2 Employment Site Allocations

Allocations NE1, NE2 and NE4 should be deleted, as they involve Green Belt and they are not required for the purpose of ensuring a sufficient supply of land during the Plan period.

As demonstrated in the ECNF responses in EL2.066i and EL10.003 at pages 99 *et seq*, the list of Existing Employment Sites (Table 8) is incomplete.

30) Pages 121 to 123: MM028 Site Specific Policies Policy NE1: Extension to Mayfield Chicks, Ewood Bridge

Even after prompting from RBC, the business already located on the adjacent existing employment site has evinced no pressing need or commitment or even a wish to extend onto NE1 - refer to Mr Bob Killelea’s email of 11th December 2020 *“we would probably [our emphasis] use the balance of the site for storage and distribution of our own goods.”* - EL8.015 at page 45. This completely undermines the first and second reasons for the allocation in the first paragraph of the Explanation. The allocation is unnecessary, rendering the Plan unsound.

Measures compensating for loss of Green Belt must be undertaken within the remaining Green Belt (NPPF, paragraph 142), a concept that RBC evidently have difficulty in applying and possibly comprehending. Therefore, in paragraph f) of the Policy after *“projects”* there should be inserted: but only in so far as they are located within the remaining Green Belt.

31) Pages 123 to 125: MM028 Site Specific Policies Policy NE2: Land north of Hud Hey, Acre
The chances of complying with condition d) are slim at best. As previously stated (EL9.006 at page 820) the conclusion that access can be taken from Hud Hey Road subject to conditions and approval by the relevant authorities seems to under-estimate the difficulties. The fact is that more than two and a half years after Submission of the Plan neither RBC nor the owners/prospective developers have produced a satisfactory access scheme. Without the guarantee of an acceptable access arrangement, the allocation of NE2 should be deleted.

Measures compensating for loss of Green Belt must be undertaken within the remaining Green Belt (NPPF, paragraph 142), a concept that, we repeat, RBC evidently have difficulty in applying and possibly comprehending. Therefore, in paragraph f) of the Policy -

in the first bullet delete “which improve access to or” and insert instead: where the footpaths so created or improved

In the second bullet after “6” insert: within the Green Belt

in the third bullet delete “and to the south of Clough End Road”, as Clough End Road is the southern boundary of the Green Belt

to both the fourth and fifth bullets add: but only in so far as the project is located within the remaining Green Belt.

In the final paragraph of the Explanation it would be best to delete all words after “issued” and rely instead on the list, as now corrected, in paragraph f) of the Site Specific Policy. Otherwise the list, as now corrected, should be reproduced. As presented by RBC, the Explanation is simply wrong in suggesting that any new footpath link to Worsley Park could be a qualifying project - the link has to be in the Green Belt. “The other side of King’s Highway” depends on one’s position and as such is unacceptably imprecise. If, as one might guess, it means the eastern side, then the existing Public Rights of Way on that eastern side could not be the subject of compensatory improvements as King’s Highway is the eastern boundary of the Green Belt. “The existing Public Rights of Way on the other side of . . . any surrounding Green Belt areas” is a curious expression and probably not what its author means, but, if the Right of Way is not in the Green Belt, it cannot qualify for a compensatory improvement.

In the first paragraph of the Explanation the word “new” should preface “boundary”, not “Green”.

32) Pages 126 to 129: MM028 Site Specific Policies Policy NE4 New Hall Hey

It is not accepted that, as the Explanation claims, exceptional circumstances have been demonstrated for Site A to be released from the Green Belt. There is an adequate supply of employment land without recourse to the Green Belt.

Both paragraph (e) of the Policy and the Explanation fail to make clear that the compensatory measures must take place within the remaining Green Belt. Improvements outside the Green Belt would not satisfy NPPF paragraph 142.

33) Pages 133 to 135: MM029 Site Specific Policies Policy EMP3: Employment Site and Premises.

This policy is far too restrictive particularly when RBC are already safeguarding 31ha of land for employment and it needs to be urgently reviewed. The ring of protection on some of these sites needs to be removed to allow the sites that are no longer fit for purpose to be used for housing.

This source of supply should be fully quantified and included as a category in the Plan before any Green Belt land is allowed to be released.

34) Pages 136 and 137: MM031 Policy EMP5: Employment Development in non-allocated employment areas.

The addition of this extra source of supply for employment purposes which is not quantified provides further support for the release of Employment Land which is no longer fit for purpose to be used for housing.

“As out” in the final sentence makes no sense.

35) Pages 144 to 148: MM034: Strategic Policy R1: Retail and Other Town Centre Uses

35.1 Most of the representations in this paragraph and paragraphs 36 to 40 below have been submitted previously, in ECNF’s response to RBC’s paper on Action 8.006.1 - Provision for Retail and Other Town Centre Uses (please refer to document **EL9.006 at pages 705 to 711**). It is a matter of concern that in producing the PMMs, RBC have not taken the opportunity to correct even basic errors that were pointed out.

35.2 Page 145

The reference to “town, district, local and neighbourhood parades” is puzzling. What are town, district and local parades?.

The Policy refers to the PSA (Primary Shopping Area) of local centres, but local centres do not have a PSA.

35.3 Pages 145 and 146

The final paragraph should begin “A proposal that requires . . .”, not “Proposals that require . . .”, as the first three bullets begin “It . . .”.

35.4 Pages 146 and 147 Table 10

In the heading to column 3 of the Table add “or Parade”.

Row 2 states that Rawtenstall Town Centre provides “for the Borough’s primary shopping needs, particularly non-food”. As the Town Centre, as identified on the Policies Map, includes two large supermarkets (Asda and Tesco), various food shops and a market, the statement that the Town Centre provides particularly for non-food shopping needs seems highly questionable. Unless RBC produce evidence that spending in the Town Centre on non-food shopping exceeds that on food, the statement must be regarded as untrue. The word “particularly” should be replaced by “both food and”.

Row 3: The words “the locally” make no sense.

Row 3: the concept of “local town centre uses” is unclear and requires definition, particularly as Town Centre and Local Centres are separate ranks from District Centres in RBC’s retail hierarchy.

Row 5: The Edenfield Neighbourhood Parade, as identified on the Policies Map, does not provide for top-up shopping. The Table is therefore incorrect.

35.5 Page 147: “While in Bacup” should be changed to “In Bacup”.

35.6 Page 148: The footnote reference against “uses” should be 1, not 2.

35.7 For the above reasons, Policy R1 is unclear and therefore unsound.

36) Pages 148 and 149: MM035: Policy R2: Rawtenstall Town Centre Extension

36.1 The Policy refers to “the area defined on the Policies Map within Rawtenstall Town Centre, shown as an extension to the Primary Shopping Area”.

The Explanation of the Policy says “The site of the former Valley Centre . . . is identified (it does not say where) as a ‘Future Primary Shopping Area Extension’”.

The Policies Map marks some land as “Rawtenstall Future Expansion”.

The various descriptions render the Policy unclear and the Plan unsound.

The role of the Policies Map is to illustrate geographically the application of policies in the Plan. If the geographical illustration of a policy is flawed, the policy will be unsound.

37) Pages 149 and 150: MM036: Policy R3: Development and Change of Use in Town, District and Local Centres and Neighbourhood Parades

37.1 Although the words “and Neighbourhood Parades” are added to the Policy title by the PMM, the repeated use of the phrase “these centres” and the use of the words “the centre” leave doubt as to whether the criteria for change of use and development apply also to Neighbourhood Parades. The Policy is therefore unsound.

37.2 In the Policy in a), “pub” should be changed to “public house”.

38) Pages 150 and 151: MM037: Policy R4: Existing Local shops

38.1 Use Class F.2(a) would seem to cover the ‘local shops’ contemplated by Policy R4. Reference to Use Class E(a) is therefore unnecessary and confusing.

Therefore further amend the policy text by deleting all the words in brackets except “Use Class F.2(a)”.

If, on the other hand, it is considered that some local shops fall outside Class F.2(a), then the term “local shop” should be clearly defined in the Policy.

39) Page 151: MM037: Policy R4: Existing Local shops - Explanation

39.1 American usage should be avoided by deleting “of” in “outside of”.

39.2 When the subject is “local shops”, the verb should be “constitute”, not “constitutes”.

39.3 Delete “the Government introduced changes to”, and replace “to enable” by “was amended to facilitate”.

The relevance of that sentence and its reference to the re-purposing of buildings on high streets and in town centres are doubtful, as the Policy and Explanation are concerned with local shops. Delete “not surrounded by” as this is confusing, inaccurate and not in accordance with the wording

of the Use Classes Order, and replace with “which are more than 1000 metres from”. Delete “within 1000 metres”.

Change “category” to ‘Use Class”.

39.4 The final sentence is not clear as to whether it is the changes to the Use Classes Order or to Policy R4 that are providing extra protection for local shops.

40) Pages 151 and 152: MM038: Policy R5: Hot Food Takeaways

40.1 Paragraph b) is unclear. Does it mean “where the proposed development would be located in a town or district centre but outside the primary shopping area, it is . . .”? If so, it should be amended to say so. As it stands, the Policy is unsound.

40.2 The policy for proposed hot food takeaways outside town and district centres is not stated. Its omission leads to confusion and is unsound.

40.3 There are several issues with paragraph d).

Whether Public Health England (PHE) actually classify the pupils, as the proposed wording states, is doubtful. PHE is responsible for national oversight of the National Child Measurement Programme and provides operational guidance; local authorities obtain relevant data and return them to NHS Digital; PHE publishes small area data at ward level.

Limitations on the data include: (i) a parent or carer may withdraw their child from the process and (ii) the data are sourced from state-maintained schools only, excluding private school pupils and home-schooled children.

It follows that it is essential to relate the criterion to the NCMP data.

It is not clear whether “more than” is meant to apply to 10% as well as 15%.

The word “age” is unnecessary.

The fourth bullet should therefore be amended to read: “the proposed development is not in a ward where more than 15% of Year 6 pupils or more than 10% of Reception class pupils are classified as obese according to National Child Measurement Programme data”.

Retaining the unachievable, non-existent criterion renders the Policy unsound

40.4 Paragraphs f), g), h) and i) should be re-lettered e), f), g) and h) respectively.

41) Pages 153 to 156: MM040: ENV1: Strategic Policy ENV1: High Quality Development in the Borough.

There is conflict between this Policy and Policy HS4 Housing Density, which the PMMs fail to resolve. Accordingly the Plan is unsound through being uncertain and self-contradictory.

The Strategic Policy itself looks fine but it is hard to see how site H62/H72 could be developed consistently with its following criteria:

a) *Massing and Scale*: **The scale of the development is disproportionate to the existing settlement - it creates 50% growth in one of the smaller villages in comparison with 10% for the Borough as a whole.**

b) *Safeguarding and enhancing the built and historic environment: There is only limited safeguarding of historic environments when Edenfield Parish Church a Grade II* Listed Building dating back to 1614 has previously been subjected to development on its northern boundary and now the proposals are to create a substantial development to the southern boundary. This cannot be acceptable in any circumstances. It is likely that the setting of the Church will be harmed, and there is no possibility of its being enhanced by the development.*

c) *Being sympathetic to surrounding land uses and occupiers, and avoiding demonstrable harm to the amenities of the local area:*

There is absolutely no way a development of this size in a small village like Edenfield could be considered as sympathetic and particularly to the surrounding occupiers. For example, creation of a site access from Market Street is likely to result in a considerable reduction in on-street parking availability to the inconvenience of the residents, especially elderly or disabled residents, whose houses have no space to park in their own grounds and who depend on having their motor vehicle close to their front door.

Reference to the comments below from RBC's own Landscape Architect Consultants highlights the harm being caused by this development: Penny Bennett Landscape Architects: "***The greater part of site, Area A is unsuitable for development, because the effects on the landscape would be significant, and would be uncharacteristic of the local landscape character area, 8b Irwell Valley south. Nor could it be effectively mitigated against because of the site's openness. Long views west from [Market Street] and eastwards from the far side of the valley would be affected and there would be significant adverse effects on attractive and well used walks in the area.***"

d) *"The scheme will not have an unacceptable adverse impact on neighbouring development by virtue of it being over-bearing or oppressive, overlooking, or resulting in an unacceptable loss of light nor should it be adversely affected by neighbouring uses and vice versa."*

It is not clear what the words "and vice versa" add to the criterion.

i) *Providing landscaping as an integral part of the development, **protecting existing landscape features** [our emphasis] and natural assets, habitat creation, providing open space, appropriate boundary treatments and enhancing the public realm; Refer to comments above about criterion c) with respect to the protection of existing landscape.*

p) *Consideration of Health impacts, including through a Health Impact Assessment for major developments, looking particularly at effects on vulnerable groups, and identification of how these may be mitigated:*

There are health issues of noise, light and air pollution related to the close proximity of the A56 which will be exacerbated in the early 2030's if both carriageways of this major road are widened to three lanes with the expansion taking place on the eastern side of the highway within site H62/H72.

r) *Ensuring that contaminated land, land stability and other risks associated with coal mining are considered and, where necessary, addressed through appropriate investigation, remediation and mitigation measures:*

There are geological issues with site H62/H72 in that it shares the same geological fault as the Clod Lane / Manchester Road site which has now been omitted from the housing trajectory. Additionally, on a major section of this Plan in Area A, the spoil from the development of the A56 was tipped to create a man-made mound north and west of Mushroom House leading to laminated clay being tipped on laminated clay, which is considered to be one of the worst substrata for development. This was highlighted as a serious concern by Highways England when this development was first mooted.

42) Pages 156 to 159: MM041: Strategic Policy ENV2: Historic Environment: *“The Council will support proposals which **conserve or, where appropriate, enhance the historic environment** [our emphasis] of Rossendale. Particular consideration will be given to ensure that the significance of those elements of the historic environment which contribute most to the Borough’s distinctive identity and sense of place are not harmed. These include:*

- *The range, wealth and quality of its places of worship;*
- *historic landscape*

Proposals affecting a designated heritage asset . . . should conserve those elements which contribute to its significance. Less than substantial harm to those elements will be permitted only where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset . . . will be permitted only in exceptional circumstances.”

The allocation of site H62/H72 is likely to harm the setting of Grade II*-listed Edenfield Parish Church. It certainly will not enhance it. The views out from the Churchyard are equally important to the setting of the Church as inward views. That harm is not clearly justified and not outweighed by the public benefits of that site allocation. There is no public benefit in the allocation: it involves the loss of Green Belt and there is adequate land elsewhere in the Borough to satisfy the local housing need.

Strategic Policy ENV2 is in conflict with Strategic Policy SD2 Urban Boundary and Green Belt and Policy HS2 Housing Site Allocations in so far as the latter two policies allocate site H62/H72. That conflict should be resolved by deleting the allocation. Otherwise the Plan is unsound.

43) Pages 159 to 161: MM042: Policy ENV3: Landscape Character and Quality: *“The distinctive landscape character of Rossendale, including large scale sweeping moorlands, pastures enclosed by dry stone walls, and stonebuilt sic settlements contained in narrow valleys, will be protected and enhanced*

In order to protect and enhance the character and quality of the landscape, development proposals should, where appropriate . . . take into account views into and from the site and surrounding area, retaining and, where possible, enhancing key views”.

It is clear that development of site H62/H72 would involve the loss of key views and harm the character and quality of the landscape. **The outstanding Landscape was confirmed by the Council’s own expert Penny Bennett Landscape Architects. Once again see PBLA’s comments below:**

“The greater part of site, Area A is unsuitable for development, because the effects on the landscape would be significant, and would be uncharacteristic of the local landscape character area, 8b Irwell Valley south. Nor could it be effectively mitigated against because of the sites openness. Long views west from [Market Street] and eastwards from the far side of the valley would be affected and there would be significant adverse effects on attractive and well used walks in the area”.

The allocation of site H62/H72 in Policy HS2 Housing Site Allocations is inconsistent with Policy ENV3.

44) Pages 186 to 188: MM053: Policy TR4: Parking:

“Where parking is being provided to serve new development or to address specific local parking problems existing residential and business areas . . .the Council will expect . . .”

The Policy contemplates addressing specific problems in existing residential areas. However, the bullets are worded so as to relate only to parking provision in and for new development. The Policy fails to address criteria for replacement provision for parking lost as a consequence of new development, such as replacing the existing on-street parking that would be lost as a result of development of site H62/H72 - refer to paragraph 41 at c) above. The Policy is inadequate and thereby unsound.

45) Page 196: MM054 Table 11: Monitoring Framework: Rossendale Local Plan: We welcome the target and triggers that RBC refers to:

“Majority of growth to occur in Key Service Centres, with proportionate growth in the other Centres.

More development occurring outside Key Service Centres than inside

Disproportionate amount of growth in smallest centres or outside centres”

This is yet another reason H62/H72 should be removed from the Emerging Plan. With 50% growth centred on Edenfield and only 10% in total Borough wide surely it rates as disproportionate.

In the next 37 paragraphs we identify various errors and *lacunae* in the Monitoring Framework. Unless all these are rectified the Framework will be not fit for purpose and will render the Plan unsound.

46) Page 197: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Strategic Policy SD2: Urban Boundary and Green Belt: Target: *“No. applications granted permission which are contrary to national policy in relation to the Green Belt”.*

Surely the target should be ‘No applications’, not the number of applications.

\

47) Pages 197 and 198 MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy SD3 Planning Obligations Target needs to be specific.

48) Page 198: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Strategic Policy HS1: Meeting Rossendale's Housing Requirement:

Target of 3,191: We challenge this target, it is incorrect to carry forward 245 homes from 2019 to 2021, and the new 15-year Plan should start no earlier than 1st April 2022. Refer to paragraphs 12.1 to 12.9 earlier in this response. The target number should be reduced to 2,775.

We also challenge the figure of 456 homes for the Edenfield Community Neighbourhood Forum and note when the 15 Small Sites and Windfalls with Planning Permission are included the total would be 471.

49) Pages 201 and 202 MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS3 Affordable Housing The trigger should be set much lower at, say, 5% and should relate to planning approvals.

50) Page 202 MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS4 Housing Density Target should be much higher, not a bare majority. Trigger should relate to approvals, not completions. No provision is made for monitoring achievement of higher densities on sites within the urban boundary and within reasonable walking distance of a bus stop on a key corridor.

51) Page 203 MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS5 Housing Standards Target and trigger need to be inserted.

52) Page 204 MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS6 Open Space Requirements in New Housing Developments. The second trigger should be set much lower at, say, 5% and should relate to planning approvals.

53) Pages 205 and 206 MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS7 Playing Pitch Requirements in New Housing Developments The first trigger should be amended to make clear that it relates to planning approvals. The second trigger would appear to be superfluous.

54) Page 206: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS8 Private Outdoor Amenity Space The Policy will not be effectively monitored in the absence of a target and trigger.

55) Page 206: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS9 House Extensions The Policy will not be effectively monitored in the absence of a target and trigger.

56) Page 206: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS10 Replacement Dwellings The Policy will not be effectively monitored in the absence of a target and trigger.

57) Pages 206 and 207: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS11 Rural Affordable Housing - Rural Exception Sites The Policy will not be effectively monitored in the absence of a target and trigger.

58) Page 207: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS12 Conversion and Re-Use of Rural Buildings in the Countryside The Policy will not be effectively monitored in the absence of a target and trigger.

59) Page 207: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS13 Rural Workers Dwellings The Policy will not be effectively monitored in the absence of a target and trigger.

60) Page 208: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy HS16 Self Build and Custom Built Houses The second trigger should be set much lower at, say, 5% and should relate to planning approvals.

61) Page 209: MM054 Table 11: Monitoring Framework: Rossendale Local Plan. Strategic Policy EMP1: Provision for Employment: RBC claim they need 27ha of land for Employment yet we have provided evidence from the outset that their real need is for approximately 10ha.

RBC's own Consultants, Lichfields, have reviewed the requirement for RBC recently and this time they are only justifying 14ha.

Also note Policy EMP 5 which is not quantified and not included as a source of supply.

Accordingly, the Policy and target figures should be reduced to 14ha and 0.9ha.

The reference to B1 is obsolete and requires amendment. There is no provision for Action.

62) Page 209 MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy EMP2 Employment site Allocations It is not clear how the second target will be monitored.

63) Page 210: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy EMP4 Development Criteria for Employment Generating Development The Policy will not be effectively monitored in the absence of a target and trigger and required action.

64) Page 210: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy EMP5 Employment Development in non-allocated employment areas The Policy will not be effectively monitored in the absence of a target and trigger and required action.

65) Page 212: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy R3 Development and Change of Use in District and Local Centres The Policy will not be effectively monitored in the absence of a target and trigger and required action.

66) Page 213: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy R4 Existing Local shops The Policy will not be effectively monitored in the absence of a target and trigger and required action.

67) Page 213: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy R5 Hot Food Takeaways

First and third indicators, first trigger and first action required need to refer specifically to Hot Food Takeaways, not all *sui generis* uses.

In third indicator, for the reason in comments at paragraph 40 above about the Policy, replace “by Public Health England” with “according to National Child Measurement Programme data”.

Delete “wards” the first time it appears in the second trigger.

68) Pages 213 and 214: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy R6 Shopfronts The Policy will not be effectively monitored in the absence of a target and trigger.

69) Pages 214 and 215: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Strategic Policy ENV1 High Quality Development in the Borough The first target does not make sense.

70) Page 215: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Strategic Policy ENV1 (Climate change/energy efficiency) In the target “one . . . schemes” is wrong.

71) Pages 215 and 216: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Strategic Policy ENV2 Heritage Assets The monitoring focus here is too narrow. There should be provision also for reviewing the actual impact of development on heritage assets and, where issues are

found, to act to avoid any similar occurrence. There are several examples of decaying listed buildings in Rossendale, *e.g.*, Waterside Mill, Bacup and Horncliffe House. There is nothing in this Framework that would instil confidence that there will be no more.

As the Local Plan is a corporate document, the words “Engage with Enforcement on” are inappropriate and should be deleted. Change “*i.e.*” to “*e.g.*”

72) Pages 216 and 217 MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy ENV3 Landscape Character and Quality We have shown above the inconsistency of Policy HS2 Housing Site Allocations in allocating site H62/H72 with Policy ENV3.

73) Page 220: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy ENV7 Wind Turbines The Policy will not be effectively monitored in the absence of a target and trigger and required action.

74) Page 220: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy ENV8 Other forms of Energy generation The Policy will not be effectively monitored in the absence of a target and trigger and required action.

75) Pages 221 and 222: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy ENV9 Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality The target and trigger are too vague: it is not clear what base and period would be used to assess reductions in homes built in Flood Zone 2 and in SuDS provision.

76) Pages 222 and 223: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy ENV10 Trees and Hedgerows The Policy will not be effectively monitored in the absence of a target and trigger and required action.

77) Page 225: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy LT5 Equestrian Development The Policy will not be effectively monitored in the absence of an indicator, a target, a trigger and required action.

78) Page 225: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy LT6 Farm Diversification The Policy will not be effectively monitored in the absence of an indicator, a target, a trigger and required action.

79) Pages 225 and 226: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Strategic Policy TR1 Strategic Transport It cannot be correct for the Framework to set, as it does, year-on-year failure to meet IDP timescales as a target.

80) Page 226: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy TR2 Footpaths, Cycleways and Bridleways The Policy will not be effectively monitored in the absence of a target and trigger and required action.

81) Page 227: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy TR3 Road Schemes and Development Access The Policy will not be effectively monitored in the absence of a target and trigger and required action.

82) Page 227: MM054 Table 11: Monitoring Framework: Rossendale Local Plan Policy TR4 Parking The Framework fails to provide a monitoring mechanism to ensure provision of appropriate levels of parking. It is not clear how the recharging points target is to be calculated - is it *per annum*, is it over the plan period, is it only in the final year of the plan, or what? The recharging points trigger is unclear - what condition does it mean, and does 75% apply to the dwellings permitted or the number of permissions? For both target and trigger it would be necessary to differentiate between houses, which require their own point, and apartments, which require one point per five dwellings.

83) We refer to document EL 12.008 Implications of the NPPF 2021 on the emerging Rossendale Local Plan 2019-2036 and comment as follows, by reference to the page number in EL12.008 and the relevant paragraph number in NPPF (2019).

83.1) Page 2: Paragraph 7: *Goal 11 of the 17 Global Goals for Sustainable Development (SDGs) is 'Make cities and human settlements inclusive, safe, resilient and sustainable'. Target 11.4 of the SDGs Targets and Indicators adopted by Resolution of the United Nations General Assembly on 6th July 2017, as amended, is 'Strengthen efforts to protect and safeguard the world's cultural and natural heritage'.*

Contrary to that Goal, the ELP allocation of site H62/H72 Land west of Market Street, Edenfield is inimical to the protection of the setting of Grade II*-listed Edenfield Parish Church and as such fails to protect and safeguard the world's cultural heritage. The Plan is therefore contrary to national planning policy and unsound.

83.2) Page 2: Paragraph 7: *Goal 13 of the SDGs is 'Take urgent action to combat climate change and its impacts'. Target 13.2 is 'Integrate climate change measures into national policies, strategies and planning'. Strategic Policy ENV1 in the Submission Version contained 18 criteria for new development proposals in the context of taking account of the character and appearance of the local area.*

Of these only criterion q) - *'Designs that will be adaptable to climate change, incorporate energy efficient principles and adopting principles of sustainable construction including Sustainable Drainage Systems (SuDS)'* - addresses climate change.

The only PMM relevant to climate change to Policy ENV1 appears to be **'An SPD addressing climate change will also be produced'**, and that comes under the Explanation , not the Policy. Whilst the promise to prepare a SPD is laudable, that PMM counts as an admission that the ELP does not meet Target 13.2. RBC claim paragraph 7 of the NPPF has **'No implications for the ELP'**, but the facts are that RBC have not demonstrated that the ELP has taken into consideration the 2030 Agenda for Sustainable Development and that the ELP is unsound for failure to comply with paragraph 7.

83.3) Page 2: Paragraph 11: The NPPF states that *'all [our emphasis] plans should promote . . . development that seeks to . . . mitigate climate change. . .'*

That requirement applies to the ELP and is not discharged by a promise to produce an SPD at some time. The fact is that the ELP fails the new Framework test and is thereby unsound.

83.4) Page 3: Paragraph 22: RBC protest that this has no implications for the ELP, but their comment is irrelevant, as they fail to grasp that the addition to NPPF paragraph 21 does not apply to the ELP - see NPPF. Annex 1, paragraph 221.

83.5) Page 3 Paragraph 35: RBC claim *"The policies of the ELP are consistent with all relevant statements of national planning policy"*.

This is clearly not the case as allocation H62/H72 is on Green Belt land when there are many other valid sites available on non-Green Belt Land. Refer to Paragraph 12.7 of this response and note there is more than double the number of 3,191 available. We have repeatedly drawn attention to instances where the ELP is not in conformity with planning policy.

83.6) Pages 6 and 7: Now paragraphs 128 and 129: ECNF's draft Edenfield Neighbourhood Plan, which is based on effective community engagement, which reflects local aspirations and which was submitted to RBC on 7th April 2020 includes design codes. RBC should commit to including these in the proposed Design SPD, in so far as the SPD relates to Edenfield.

83.7) Page 11 New paragraph 218: it is cause for concern that RBC should say that paragraph 218 has no implications for the ELP as it is a county matter and for even more concern if they genuinely believe that to be the case. Obviously, Annex 1 applies to the NPPF as a whole.

83.8) Page 11 New paragraph 221: RBC are in a complete muddle - please refer to comment above about paragraph 22.

83.9) Particularly having regard to the numerous errors and misunderstandings in EL12.008, which RBC have put forward as an evidence document, it is wrong that the public have not been invited to make representations about it.

84) We take this opportunity to draw attention again to discrepancies between Table 7 (formerly Table 1) in Policy HS2 and the Policies Map which render Policy HS2 unsound:

1. The description of site H62/H72 in Table 7 (formerly Table 1) in Policy HS2 was rightly amended to 'Greenfield' from 'Mixed but largely greenfield' (Erratum in document SD024 issued on 3rd September 2018), because it was accepted that it did not include the 'Horse & Jockey' site. Regrettably, the Policies Map was not corrected at that time or subsequently.
2. H62/H72 was always understood to comprise three SHLAA references: 16256 (net developable area 2.09ha, yield 63), 16262 (9.12ha, 273) and 16263 (2.32ha, 70), giving a total net developable area of 13.53ha (yield 406, rounded to 400). This was confirmed at one of our meetings with Mr Adrian Smith of RBC's Forward Planning Team.
3. The SHLAA 16262 [EB 004 Appendix E - Sites Assessment (2018), page 648] boundary follows the field boundary seen on the map of GB(Major)9 (EL1.002dd(i), page 36) so as to exclude the house called Alderwood and the former Vicarage. The SHLAA included Mushroom House within its 'red edge' and noted that the site's development area was reduced by "dwelling house, private garden (0.34ha)" (presumably Mushroom House).
4. The H&J site is SHLAA 16358. It has yielded ten dwellings, completed in the year commencing 1st April 2019, and should have been a separate allocation in Table 1 in Policy HS2 of the Local Plan. Clearly, those ten are in addition to the 406 from the other three SHLAAs.
5. The H&J site was a discrete allocation, H88, in RBC's consultation draft of Rossendale Local Plan Part 2 "Lives and Landscapes" - Site Allocations and Development Management Policies 2015, which was withdrawn on 24th February 2016. As long ago as 6th October 2015 RBC's Development Control Committee resolved that planning permission 2015/0238 should be granted for the development that has taken place, although its issue was deferred pending completion of a planning obligation.
6. Some of these issues were explored in Richard Lester's response to MIQs Matter 8 (EL2.064e). Please note that references therein to SHLAA 162672 should be to SHLAA 16262. They were also mentioned in our responses to Actions 14.1 to 14.4 - Housing Site Allocations (please refer to EL9.006 at pages 730 and 731) and to EL10.001 Housing Update May 2021 (please refer to EL10.003 at pages 96 to 98).
7. A complication arises from the way the Policies Map has been drawn. It shows Alderwood, the old Vicarage, and other land outside SHLAA 16262, as included in H62/H72 and washed over in orange. In contrast Mushroom House is excluded from the orange wash. This demonstrates inconsistency of treatment of the properties.
8. It means also that the description of H62/H72 as greenfield is inconsistent with the Map, which, whilst it excludes Mushroom House, covers the old Vicarage, Alderwood etc, which are self-evidently previously developed land.
9. The foregoing does not detract from the crucial point that the H&J site is and must be treated as separate from H62/H72. The history of the SHLAAs and the total yield of 406 from the three component sites rounded to 400, together with the correction to H62/H72 in Table 1 (document

SD024), whereby RBC accepted the truth of the matter, confirm that this is the case. So too do the sites' planning histories.

10. H62/H72 was and is a Greenfield site. It is not 'Mixed' or 'Mixed but mainly Greenfield'. Accordingly, the Policies Map requires correction so as to omit the H&J site and the other land outside the three SHLAAs. It would not be appropriate to amend Table 1 again to make it conform with an incorrect map.

11. We stress that we maintain our objection in the strongest terms to the allocation of H62/H72. Our concern is that the Plan documentation needs to be presented consistently and accurately, and we regret that it is necessary to point out these examples of how RBC have failed in this regard.

12. The role of the Policies Map is to illustrate geographically the application of policies in the Plan. If the geographical illustration of a policy is flawed, the policy will be unsound.

85) The Government has recently indicated that no more homes will be built on greenfield sites (Prime Minister Rt Hon Mr Boris Johnson to Conservative Party Conference, 6th October 2021), and Secretary of State Rt Hon Mr Michael Gove sees his task as "allowing communities to take back control of their futures and creating greener and more beautiful places to live" (speech to Conference on 4th October 2021). Pursuing the release of sites H61/H71 and H62/H72 therefore flies in the face of emerging national planning policy. The Edenfield community has already expressed, in the Regulation 18 and Regulation 19 consultations, its unequivocal opposition to the housing development proposed for the village.

86) We summarise below the key issues in this response with paragraph references:

Invalidity of consultation 1, 2, 3, 12.1, 83.9

Spatial Strategy unsound for not protecting Green Belt 9, 15

Unsound, incorrect classification of Edenfield as Urban Local Service Centre and disproportionate growth 11, 41, 45

Unsound, incorrect calculation of housing need as 3,191 and unsound, incorrect Plan period 12.1 to 12.9, 20, 21, 23, 28, 48

Unsound calculation of housing supply 12.3 to 12.9, 15, 22

Unsound, unnecessary release of Green Belt 12.8, 15, 16, 19, 25

H62/H72

- Incorrect assumption re provision of affordable tenures. Unsound 15
- False claim of limited impact on openness by release from Green Belt - unsound 13, 41, 43, 72
- False suggestion that present GB boundary is not strong 15

- Lack of protection for Grade II*-listed Edenfield Parish Church. Unsound 6, 25, 41, 42
- Unresolved transport and access issues Unsound policy 25, 44
- Unresolved geotechnical issues 25, 41
- Unresolved issues around primary school provision 25
- Health issues 25, 41
- Allocation (Policies HS2 and SD2) conflicts with Strategic Policy ENV2 Unsound 16, 22, 42
- Conflict between Policies HS2 and Strategic Policy ENV1. Unsound 41
- Conflict between Policies HS4 and Strategic Policy ENV1. Unsound 27, 41
- Conflict between Policies HS2 and ENV3. Unsound 43,72
- Allocation unsound as not identified accurately on Policies Map 84

H61/H71

- False statement that only major housing schemes are proposed on Green Belt releases. 15
- False assumption that it is previously developed. Mistaken basis for allocation - unsound. 15, 24

Insufficient evidence of existing employment sites; excessive requirement for employment land; no exceptional circumstances to justify Green Belt release. Unsound, contrary to NPPF, paragraph 140. 4, 5, 7, 14, 16, 19, 28, 29, 30, 31,32, 33, 34, 61

Access issues threaten deliverability of site NE2 31

Unsound strategic priorities 8

Green Belt release contributes to urban sprawl and discourages urban regeneration, contrary to NPPF Unsound 13

Policy HS4 rendered ambiguous by explanation. Unsound 27

Policy EMP3 too restrictive and unsound 33

Policy SD4. Failure to insist that compensatory measures will be **in Green Belt** does not comply with NPPF paragraph 142 No justification to limit location of Green Belt improvements. Unsound 18, 19, 24, 25, 26, 30, 31

Green Belt Compensation document not available 25

Limit on location of Green Belt improvements unsound 19

Vagueness of requirement for assessments of impacts on Health and Breeding Birds 25, 41

Retail

- Nomenclature issues 35.1

- False statement that a local centres has a Primary Shopping Area 35.2
- Edenfield Neighbourhood Parade wrongly classified 35.4
- Incorrect description of Town Centre function 35.4
- “Local town centre uses’ unclear 35.4
- Policies unsound 35.7, 36.1, 37.1, 40.1, 40.2, 40.3, 67

Monitoring Framework - many errors and omissions - not fit for purpose - unsound 45 to 82

Implications of NPPF 2021 83.1 to 83.9

Emerging Government policy 85

Careless presentation 10, 17, 25, 27, 31, 34, 35.3, 35.4, 35.5, 35.6, 37.2, 38.1, 39.1, 39.2, 39.3, 39.4, 40.4, 41, 67, 71

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



15th October 2021

Examination of the Rossendale Local Plan

EL12.003: Sustainability Appraisal of the Proposed Main Modifications

Representations by A.G. Ashworth and R.W. Lester about RBC's Paper published on 3rd September 2021

Key Points

- 1) Plan Period and Plan number changed:** New housing figure should be 2,775 with Plan period from 01.04.22 – 31.03.37. Refer to Page 2, Paragraph 3.
- 2) Plan Vision and Objective:** RBC claim a minor positive impact across all SA objectives. This is totally refuted with respect to site H62. Refer to Pages 2 and 3, Paragraph 4.
- 3) Hierarchy: Local Service Centres:** Edenfield should not be classed with Waterfoot, Stacksteads, Crawshawbooth or Helmshore in terms of size. In Edenfield the landscape, existing built form and rural area character would be damaged, not protected, by development of H62/H72. Refer to Page 3, Paragraphs 5 and 6.
- 4) Policy SS:** The proposed development of H62/H72 conflicts with this policy as it would exceed the capacity of local services/infrastructure and result in significant harm to the existing character and quality of the landscapes and townscapes. Refer to Page 3, Paragraph 6.
- 5) Spatial distribution of growth:** Growth proposed for Edenfield is 50% compared with 10% for the Borough as a whole. RBC claim they have examined the Reasonable Alternative Sites to assist with the distribution of growth, however this has been proved to be totally incorrect. Refer to Pages 3 and 4, Paragraph 7.
- 6) Cultural Heritage:** Deliberate exclusion of critical facts that adversely affect the Plan. Refer to page 4, Paragraph 8.
- 7) Landscape:** RBC claims it is uncertain if new development at these locations would result in negative impacts on the local landscape. It is incumbent on the authors of the SA to express an opinion on the impact of development on the landscape. Refer to Page 4, Paragraph 9.
- 8) Human Health:** Site H62/H72 is outside a sustainable distance from health services and the air quality is questionable owing to its being within 200m of the A56. Refer to Pages 4 and 5, Paragraph 10.
- 9) Transport:** RBC claims new residents could potentially be located in areas with limited access to existing transport routes. With statements like this how can Lepus upgrade from minor negative to minor positive without providing any evidence for the change? Refer to Page 5, Paragraph 11.
- 10) New Policy SD4: Green Belt Compensatory Measures:** The failure of the SA to examine and challenge this fundamental flaw in MM005 seriously detracts from the validity of the SA. Refer to Page 5, Paragraph 13.
- 11) Conclusion:** The SA fails to take proper account of the negative impacts that the H62/H72 allocation would have on the landscape, townscapes, built heritage, rural character, education and transport infrastructure. Refer to Page 5, Paragraph 14.

Examination of the Rossendale Local Plan

EL12.003: Sustainability Appraisal of the Proposed Main Modifications

Representations by A.G. Ashworth and R.W. Lester about RBC's Paper published on 3rd September 2021

Representations

1) Page 1: Paragraphs 1.2.1 and 1.2.3 list the previous Lepus documents, particularly the SA Addendum in 2020, to which we responded in ECNF Response to **EL 8.001.3** (EL9.002 at pages 187 to 206) highlighting the inconsistencies with their various reports, the failures to consider all the objectives and our conclusion that the many flaws in their Spatial Options appraisal resulted in the report being '**not fit for purpose**' (*ibid.*, page 205)

2) Page 4: Paragraph 1.2.4: Reasonable Alternative Sites: Please refer to ECNF Response to EL 8.001.2 (EL9.002 at pages 185 and 186): Conclusion: Item 5: "It looks as if RBC are suppressing the real opportunities available and selecting sites that will not be acceptable, thus enabling them to continue with their attempts to justify the use of Green Belt Land."

3) Page 23: Proposed Main Modification MM 001: Housing and Employment: The Plan period has now been changed and the calculation method adopted for housing need is extremely suspect and questionable. In normal circumstances there would be no carry-over of any shortfall from previous years when a new 15-year plan is started and there would just be a penalty applied to the new number of 2,775. The penalty would require an extra 20% of the first five years of this number being constructed in the first five years of the Plan. In other words the number from 2021/2 to 2025/6 would need to be 185 dpa for 5 years = 925 with a 20 % penalty giving 1110. This would leave 1665 to be built in the remaining 10 years of the Plan. What is required is a 15 year Plan from 1st April 2022, running to 2037. The new housing number should not include any shortfall for 2019/21-2021/2. **New total should be 2,775, not 3,191. Please refer to our response to EL 12.002 for the supporting evidence and calculations used to arrive at this number.** RBC claim that their objectively assessed need for employment land remains at 27ha despite the fully supported claims by Edenfield Community Neighbourhood Forum (ECNF) that they only need between 8ha and 12 ha and their own consultant's recent reassessment of 14ha. The credibility of EL12.003 is brought into question by its failure to challenge the calculation of housing need and the claimed employment land requirement.

4) Pages 24 and 25: Matrix and Paragraphs 4.3.1 to 4.3.5: The SA states that the Plan vision and objectives would be expected or likely to have a minor positive impact across all SA objectives. That statement is not supported by evidence. The release of Green Belt site H62/H72, Area A of which Penny Bennett Landscape Architects said should not be built on, will have a major negative impact on the first SA objective - Landscape. In the absence of any clear proposals for protecting or enhancing the setting of Grade II*-listed Edenfield Parish Church, it must be assumed that the allocation of H62/H72 will also have a major negative impact on the second SA objective - Cultural Heritage.

5) Page 29: Proposed Main Modification MM 002 Hierarchy: Local Service Centres:

Paragraph 4.4.3 states: *As illustrated within Table 4.2, the structure of the hierarchy follows the size of the settlements as well as the extent of services and facilities they provide. The focus of development, and higher densities of development, would be sought near to the Key Service Centres and in particular Rawtenstall as the Primary Centre. Development elsewhere in the borough would be required to take into account [quoting Strategic Policy SS Spatial Strategy] the “suitability of the site, its sustainability, and the needs of the local area, whilst protecting the landscape and existing built form and the character of rural areas [our emphasis]”.*

First, paragraph 4.4.3 ignores the fact that there is absolutely no way Edenfield can be compared with Waterfoot, Stacksteads, Crawshawbooth or Helmshore in terms of size.

Secondly as regards the words we emphasise in Paragraph 4.4.3, the authors of EL12.003 ignore the harm to landscape identified by Penny Bennett and to the built heritage (including the setting of Grade II*-listed Edenfield Parish Church). They ignore also the detriment to the character of a rural area that will follow from increasing, as the Plan proposes, the number of dwellings in Edenfield by some 50%.

6) Page 29: Proposed Main Modification MM002: Paragraph 4.4.4 states: *Policy SS acknowledges the requirement for some development to occur on greenfield land within Rossendale in order to meet the identified needs, however, the policy also seeks to ensure that the level of growth within each settlement is appropriate to the size and provision of services and infrastructure. This includes the highest levels of growth in the Key Service Centres, in contrast to small scale, limited in-filling within Smaller Villages and Substantially Built-up Frontages. Therefore, this would be expected to ensure that new development does not exceed the capacity of local services / infrastructure and does not result in significant harm to the existing character and quality of the landscapes and townscapes.*

Paragraph 4.4.4 blithely disregards the facts that the Plan proposals would increase the number of dwellings in Edenfield by 50%, compared with an overall increase of 10% in the Borough, that the current capacity of schools and highway infrastructure would be exceeded with no definitive proposals for increasing same and that there would be significant harm to the existing character of local landscapes and townscapes.

7) Page 29 Proposed Main Modification MM 002 Paragraph 4.4.5 states: *The spatial distribution of growth in Rossendale has been considered throughout the SA process, including testing of reasonable alternative spatial options and appraisal of the chosen spatial strategy. The findings of these appraisals have been documented in the Regulation 19 SA Report and SA Addendum. The locations that feature in the updated settlement hierarchy, as referred to within the amended Policy SS, have all been considered in the SA in terms of broad spatial distribution, as well as individual site assessments and cluster assessment approach during earlier SA stages.*

We have commented from the outset that RBC’s evaluation of the Reasonable Alternative Sites is seriously flawed and we submitted a list of 58 sites which would provide a minimum of 2,760 homes that have been approved by a Local Chartered Town Planning Expert with intimate knowledge of all the sites. Refer to the ECNF response to EL 8.008.7 Appendix C (EL9.002 at page 245) for a site-by-site analysis and to EL 8.001.2 Page 2 (EL9.002 at page 186) - Comment 5 - “It looks as if RBC are suppressing the real opportunities available and including sites that will not be acceptable, thus enabling them to continue with their attempts to justify the use of Green Belt Land.”

8) Pages 29 et seq Paragraph 4.4.7 and Table 4.3 Cultural Heritage. The previous assessment of Strategic Policy SS is replicated, but It is deplorable that there is still no specific mention of Grade II*-listed Edenfield Parish Church with parts dating back to 1614, although other buildings are identified. Rather than avoiding the question, the SA of the Proposed Main Modifications should have belatedly addressed the impact of the H62/H72 allocation on the setting of the Church.

Once again we are provided with an example of the devious tactics employed by Lepus / RBC and their deliberate exclusion of critical facts that adversely affect their Plan.

(Refer also to the ECNF response to EL8.001.3: Pages 9 to 12 (EL9.002 at pages 195 to 198): SA 2 Cultural Heritage - again our comments highlight the changes made by Lepus to upgrade the original result from minor negative to negligible. How could Lepus possibly arrive at a negligible result when the development is proposed right up to the churchyard wall of a Grade II*-listed building with parts dating back to 1614?)

9) Page 30: Table 4.3: Landscape: *This LCT has moderate to high sensitivity to new development, particularly in relation to scale and heritage. It is uncertain if new development at these locations would result in negative impacts on the local landscape.*

It is incumbent on the authors of the SA to express an opinion on the impact of development on the landscape. If there is doubt, the 'worst case scenario' should be applied. The SA acknowledges that development at the edge of settlements has the potential for negative impacts on countryside views. On that basis and in the light of the Edenfield LCT's 'moderate to high sensitivity to new development' and having regard to the Penny Bennett report, it is hard to detect a rational basis for saying, as the SA effectively does, that it is uncertain if new development of site H62/H72 would result in negative impacts on the local landscape. (Refer also to the ECNF response to Action 8.001.3: Pages 8 and 9 (EL9.002 at pages 194 and 195): SA 1 Landscape- Comments and the highlighting of the changes made by Lepus to upgrade the original major negative result to a minor negative.")

10) Page 32: Table 4.3 Human Health: Paragraph 1: *There are no NHS Hospitals located within Rossendale. Royal Blackburn Hospital, Accrington Victoria Hospital and Burnley General Hospital are located to the north of the Borough, Fairfield General Hospital and Rochdale Infirmary are located to the south. The development locations of Acre, Carrs Industrial Estate, Haslingden, Love Clough, Crawshawbooth, Rawtenstall, Stubbins, Chatterton, Turn, Britannia, Barlow Bottoms, Facit, Whitworth and Broadley are all situated within the target distance to one of these hospitals and therefore, new residents at these locations would be expected to have good access to this essential health service. **The other fourteen development locations identified in Policy SS are not situated within the target distance to hospitals and therefore new residents would be likely to have limited access to this healthcare service.***

Paragraph 2: *New residents in Turn, Stubbins, Chatterton, Edenfield, Irwell Vale, Ewood Bridge, Helmshore, Acre, Love Clough, Crawshawbooth, Water, Whitewell Bottom, Stacksteads, Weir, Sharneyford, Britannia, Barlow Bottoms and Broadley would **not be located within the target distance to a GP surgery and therefore, would be unlikely to have adequate access to this healthcare service.***

Paragraph 3: *All other development locations listed under Policy SS would not situate new residents within the target distance of a leisure centre and therefore, **new residents could potentially have limited access to this service.***

How can the largest site H62/H72 which is approximately three times larger than the second biggest site in the Local Plan be considered when it will have limited and inadequate access to healthcare services and limited access to a leisure centre?

These details about Human Health are repeated out of context and without explanation of the term 'target distance'. We understand that this means 800m for a GP surgery and 5,000m for a hospital, but in the absence of a target map showing the hospitals, the target distance and the development locations, it is difficult to verify whether the specified locations are within the target distance. We understand also that hospital in this context means a hospital with A&E and would observe that the Accrington and Rochdale hospitals do not have such a facility. Document EL12.003 therefore fails to provide a clear and accurate sustainability appraisal of the implications of the Main Modifications for Human Health.

(Refer also to the ECNF response to 8.001.3 Paragraph 10: Page 14 (EL9.002 at page 200): SA 8: Human Health – As site H62/H72 is outside a sustainable distance from all health services and the air quality is questionable due to its being within 200m of the A56 how can it be awarded a minor negative result?.)

11) Page 33: Transport: Paragraph 2: *As it is expected that some development would be directed to the outskirts of urban areas, it is uncertain if new public transport links would be provided if no links are currently available. Some new residents could potentially be located in areas with limited access to existing transport routes.*

Refer to the ECNF response to EL8.001.3 Paragraph 10: Page 18 (EL9.002 at pages 203 and 204) SA 13 Transport: - Here again Lepus upgrade from minor negative to minor positive without providing any evidence for the change.

12) Overall Conclusion of the 2020 Addendum Sustainability Appraisal was that it was 'not fit for purpose'. The evidence is in our document EL 8.001.3 (EL9.002 pages 187 *et seq*) and the matrices which are appended highlight the changes made by Lepus through the process along with a realistic score provided by ECNF.

13) Page 34: 4.5/ 4.5.1: New Policy SD4: Green Belt Compensatory Measures:

Document EL12.003 accepts uncritically Proposed Main Modification MM005, which we examine in our response to document EL12.002. In particular the projects identified in MM005 apart from Edenfield Cricket Club and PRowS etc will not or are unlikely to be in remaining Green Belt. The failure of the SA to examine and challenge this fundamental flaw in MM005 seriously detracts from the validity of the SA.

14) Page 65 Conclusions The SA fails to take proper account of the negative impacts that the H62/ H72 allocation would have on the landscape, townscapes, built heritage, rural character and transport infrastructure.

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

15th October 2021

6 Alderwood Grove, Ramsbottom, Bury BL0 0HQ

APPENDIX (referred to in paragraph 12)

Impact Matrices of the four Spatial Options:

1) Matrix from Table 2.3 on Page 16 in the Lepus/RBC SA dated July 2018.														
SO	L	CH	B&G	W&F	NR	CCM	CCA	HH	MA	H	EL	ES	T	Tot.
A	-2	-1	-1	-2	-2	-2	-2	1	-2	1	1	1	1	-9
B	-2	-1	-1	-2	-2	-2	-2	-1	-2	2	2	1	-1	-11
C	-2	-1	-1	-2	-2	-2	-2	1	-2	-2	1	1	1	-12
D	-2	-1	-1	-2	-2	-2	-2	1	-2	2	1	1	-1	-10

2) Matrix from Table 5.2 on Page 47 of the Lepus/RBC SA dated June 2020.														
SO	L	CH	B&G	W&F	NR	CCM	CCA	HH	MA	H	EL	ES	T	Tot.
A	-1	-1	-1	-2	-2	-1	-2	-1	0	0	1	1	1	-8
B	-1	-1	-1	-2	-2	-1	-2	-1	0	0	1	1	-1	-10
C	-1	0	-1	-2	-2	-1	-2	-1	0	0	1	1	1	-7
D	-1	0	-1	-2	-2	-1	-2	-1	0	0	1	1	1	-7

3) Prepared by ECNF following an analysis of the Lepus SAs dated July 2018 and June 2020.														
SO	L	CH	B&G	W&F	NR	CCM	CCA	HH	MA	H	EL	ES	T	Tot.
A	-1	-1	-1	-2	-1	-2	-1	-1	-2	0	1	1	0	-10
B	-2	-2	-2	-2	-2	-2	-2	-2	-2	0	1	-1	0	-18
C	-1	0	-1	-2	-1	-2	-1	-1	-2	0	1	1	0	-9
D	-2	-2	-2	-2	-2	-2	-2	-2	-2	0	1	-1	0	-18

Comments:

- 1) The variance between Tables 1 and 2 illustrates the changes made by Lepus/RBC to ensure that Option D becomes the joint best performing option. Note Options B and D both contain Site H62/H72.
- 2) Table 3, has been prepared by ECNF following the analysis of the Lepus/ RBC SA dated June 2020 and its comparison with the SA dated July 2018. It illustrates that Options A and C were the best performing options based on our evaluation and that Option A is closest to the OAN of 3150 dwellings and closest to the corrected employment land requirement of 10.66ha.

Colours:

Red: Major negative. (-2)	Yellow: Negligible.	Pale Green: Minor Positive. (1)
Pink: Minor negative. (-1)	Blue: Not assessed.	Dark Green: Major Positive. (2)

Alan G. Ashworth and Richard W. Lester for themselves and on behalf of Edenfield Community Neighbourhood Forum
15th October 2021



REPRESENTATIONS ON PROPOSED MAIN MODIFICATIONS (EL12)

ROSSENDALE LOCAL PLAN EXAMINATION

TAYLOR WIMPEY (UK) LTD

October 2021

(KW/GL/MAN.0299/R007)

Pegasus Group

Queens House | Queen Street | Manchester | M2 5HT

T 0161 393 3399 | W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN | ENVIRONMENT | PLANNING | ECONOMICS | HERITAGE

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

CONTENTS

1.	INTRODUCTION.....	1
2.	MM001 – SPATIAL STRATEGY.....	2
3.	MM002 – STRATEGIC POLICY SS: SPATIAL STRATEGY	3
4.	MM004 – STRATEGIC POLICY SD2: URBAN BOUNDARY AND GREEN BELT.....	4
5.	MM005 – POLICY SD4: GREEN BELT COMPENSATORY MEASURES.....	5
6.	MM006 & MM007 – HS1: HOUSING REQUIREMENT & HOUSING SUPPLY TABLES	8
7.	MM008 - POLICY HS2: HOUSING SITE ALLOCATIONS.....	11
8.	MM009 – ALLOCATION H62: LAND WEST OF MARKET STREET, EDENFIELD.....	12
9.	MM009 – ALLOCATION H64: GRANE ROAD, HELMSHORE.....	17
10.	MM013 – POLICY HS3: AFFORDABLE HOUSING	18
11.	MM015 – POLICY HS5: HOUSING STANDARDS.....	19
12.	MM040 – STRATEGIC POLICY ENV1: HIGH QUALITY DEVELOPMENT IN THE BOROUGH.....	20
13.	MM041 – STRATEGIC POLICY ENV2: HISTORIC ENVIRONMENT	21
14.	MM048 - POLICY ENV9: SURFACE WATER RUN-OFF, FLOOD RISK ETC	22
15.	MM053 - POLICY TR4: PARKING	23
16.	MM054: MONITORING & TABLE 11 MONITORING FRAMEWORK	24
17.	CONCLUSIONS.....	25

1. INTRODUCTION

1.1 Pegasus Group has been instructed on behalf of Taylor Wimpey (UK) Ltd (Taylor Wimpey) to prepare representations on the proposed Main Modifications of the Rossendale Local Plan, in respect of their land interests in the Borough. This relates to the following sites which are both allocated in the submitted plan:

- Land west of Market Street, Edenfield (within Housing Allocation H72 – now H62 in Main Modifications); and
- Grane Village, Helmshore (within Housing Allocation H74 – now H64 in Main Modifications).

1.2 The Main Modifications consultation ran between 3rd September and 15th October 2021.

1.3 Overall, we continue to support the Rossendale Local Plan as it moves towards formal adoption. We do however have comments and concerns regarding some of the proposed main modifications, as discussed in these Representations.

1.4 Our comments primarily focus on the Schedule of Proposed Main Modifications Document (EL12.002).

2. MM001 – SPATIAL STRATEGY

- 2.1 Under MM001, it is proposed that the Settlement Hierarchy (Table 1) will be amended. Notably, Edenfield is now classified as an Urban Local Service Centre. Previously, Edenfield was not identified as a specific settlement in the Spatial Strategy (Policy SS). Instead, category B of the settlement hierarchy stated that Major Sites are to be allocated at Edenfield (as well as Futures Park, New Hall Hey and Carrs Industrial Estate).
- 2.2 Taylor Wimpey are wholly supportive of the identification of Edenfield as an Urban Local Service Centre. Indeed, Edenfield is a sustainable settlement in its own right, with a number of local facilities present. This is confirmed **in the Council's evidence base**¹, which outlines how:
- Edenfield has a number of key services, including a convenience store, primary school, pharmacy, public house, takeaways etc.
 - Notably, Edenfield has the largest range of facilities of the four identified Urban Service Centres, scoring 13 bullet points compared to Crawshawbooth (12), Helmsshore (10), Stacksteads (10) and Waterfoot (12).
- 2.3 In short, Edenfield is a sustainable settlement which is an appropriate location to accommodate growth in the emerging Local Plan. We support its elevation to an Urban Local Service Centre, in the second tier of the revised settlement hierarchy (after the Key Service Centres). As we have demonstrated throughout our Representations and Hearing Statements submitted to date, the West of Market Street (H62) allocation is a highly suitable and sustainable site within Edenfield.
- 2.4 It is also pertinent that the population growth from the H62, and the other allocations in Edenfield, will generate additional footfall and spending in the area which will attract and support new services and Town Centre uses over the course of the plan period, to complement those existing facilities **listed above. This will ensure that Edenfield's role as an Urban Local Service Centre will** grow and develop over time.
- 2.5 We support the continued identification of Haslingden as a Key Service Centre, at the very top of the settlement hierarchy. This is reflective of the numerous existing services and facilities present in Haslingden, which is again well placed to accommodate higher levels of growth (at suitable sites such as Grane Village - H64).

¹ EL8.002.2 Action 2.2 – Settlement Hierarchy

3. MM002 – STRATEGIC POLICY SS: SPATIAL STRATEGY

3.1 This proposed Main Modification notes how:

"A level of growth and investment appropriate to the settlement size will be encouraged at the Urban Local Service Centres listed in Table 1 above to help meet housing, employment and service needs"

3.2 As outlined above, we are entirely supportive of this Main Modification, which now identifies Edenfield as an Urban Local Service Centre within Table 1.

3.3 The following explanatory text is also a proposed addition, outlined at page 20 of the Main Modifications Document:

*"The Borough's largest housing allocation at Edenfield (H62) for 400 new houses is located on the former Green Belt land, which has good accessibility. The scale of the site to the west of Market Street means that this allocation will contribute significantly to housing provision, including affordable tenures, in Rossendale. The strategic release of the land identified for allocation will be contained by a strong boundary (the A56), so limiting the potential for future urban sprawl. This will be perceived as the main block of settlement within Edenfield, growing incrementally north and will fill the gap between the A56 and the linear settlement along Market Street to create a stronger Green Belt boundary and settlement edge. Some smaller housing sites have been allocated on land released from the Green Belt, but only where the land is previously developed. In keeping with the priority to protect Green Belt and take forward robust boundaries for the future, only major schemes that will contribute significantly to meeting the Borough's needs for employment and housing, that have a strategic role, have been identified on Green Belt. All allocations which will result in the release of Green Belt will need to provide compensatory benefits to the **land remaining in the Green Belt.**"*

3.4 Again, we are wholly supportive of the recognition that the Edenfield Allocation (H72) has good accessibility, is **of strategic importance and will contribute significantly to meeting the Borough's housing needs.**

4. MM004 – STRATEGIC POLICY SD2: URBAN BOUNDARY AND GREEN BELT

- 4.1 We fully support this proposed modification, most notably the confirmation that exceptional circumstances exist for the release of land from the Green Belt for housing, including the land west of Market Street Edenfield (H62).
- 4.2 Whilst it is clearly shown on the proposals map it may be worth confirming that all land released from the Green Belt through allocations will be included in the Urban Boundary, just so this is fully clear in the policy text.
- 4.3 Finally, we welcome the removal of references to SANGs from this policy, as it has been acknowledged by the Council that such measures were not justified in the wider plan and evidence base.

5. MM005 – POLICY SD4: GREEN BELT COMPENSATORY MEASURES

5.1 The Council are proposing to add this as a new policy, with the following wording:

"Where land is to be released for development, compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land will be required.

Types of improvements that would be considered acceptable include the creation or enhancement of green or blue infrastructure; biodiversity gains (additional to those required under Policy ENV1), such as tree planting, habitat connectivity and natural capital; landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal); new or enhanced walking or cycling routes; as well as improved access to new, enhanced or existing recreational and playing field provision.

This policy applies to developments on land that is located within the Green Belt or on allocated housing and employment sites that were previously in the Green Belt as listed in Policy SD2.

The Council has identified a number of projects where Green Belt compensatory measures can be delivered, or proportionate contributions made towards these schemes, listed below. Further details are contained in the Green Belt Compensatory Document or its successor:

- *Rossendale Forest*
- *Rossendale Incredible Edible*
- *New Hall Hey Gateway*
- *Edenfield Cricket Club*
- *Edenfield C.E. / Stubbins Primary School Extension*
- *Public Rights of Way / Cycleway Upgrades and Improvements to the Network."*

5.2 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.

5.3 We also welcome the fact that the proposed improvements are largely focused on Green Belt land adjacent to or in close proximity to the housing and employment sites proposed for release, including Allocation H62 in Edenfield. 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.

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

Viability

- 5.5 As stressed at length in our previous 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.
- 5.6 The **Council’s latest Viability Assessment** (EL8.020.2), prepared by Keppie Massie and dated February 2021, discusses the compensatory measures at the tables in Appendix 8 (replicated 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

- 5.7 This suggests that the viability implications of Green Belt compensation on allocation H62 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 H62 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.
- 5.8 Unfortunately, this matter is still yet to be satisfactorily resolved, or the evidence base updated since we initially raised these concerns back in July 2021.

Land Ownership

- 5.9 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.**
- 5.10 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 CIL compliance to justify 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.

5.11 This is not reflected in the explanatory text in support of policy SD4 (which is an addition to the policy wording consulted on in July 2021) and states the following:

"It should be noted that planning consent may be required for additional off-site compensatory improvements. The applicant will be responsible for ensuring all required planning consents for such compensatory improvements are obtained, where this is required."

5.12 Whilst we acknowledge the potential that some off-site compensation works may require planning consent, this would be bound by regular development control **legislation and therefore doesn't need** to be specified in this policy. However, more pertinently, and as noted above a developer/ applicant cannot be **compelled by policy to submit applications for improvements on land they don't control** as this is simply not justified nor will it be effective and could lead to allocated sites not being deliverable. The Council should clarify the intention and meaning of this paragraph urgently.

5.13 In short, whilst it is commendable that the Council are looking to secure Green Belt compensatory measures in line with the NPPF, the strategy has not been fully thought out or justified. It is clear that the viability implications of the compensatory measures have not been properly accounted for and have been underestimated as a result.

5.14 Furthermore, the Council 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. The explanatory text outlined above suggests that the Council would expect **Developer's** to secure planning consent for the compensatory measures, which is simply not reasonable.

5.15 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.

5.16 This policy should be deleted unless the further information as set out above is provided.

6. MM006 & MM007 – HS1: HOUSING REQUIREMENT & HOUSING SUPPLY TABLES

6.1 Policy HS1 is proposed to be amended as follows:

"The net housing requirement for the period 2019-~~2034~~2036 will be achieved through:

a) Providing at least ~~3,180~~ 3191 additional dwellings over the plan period equating to ~~212~~ 208 dwellings a year between 2019/20 and 2020/21 and 185 dwellings a year from 2021/22 to 2035/36

b) Delivering an overall amount of 30% of all new dwellings on previously developed land (PDL) across the Borough

c) Keeping under review housing delivery performance on a yearly basis

The housing requirement figure for ~~Edenfield Community Neighbourhood Forum Area~~ Area from 2019- ~~2034~~ 2036 is 456 dwellings.

6.2 We have already made representations on this matter in our June 2021 letter, which was submitted in response to the consultation on EL10. In short, this Main Modification is a result of:

- The elongation of the plan period, to cover a 17-year plan period as opposed to the previous 15-year period;
- The use of the previous Local Housing Need (LHN) figure of 208 dwellings in the first two years; and
- The reduced LHN figure of 185 dpa in years 3-17.

6.3 In essence, the proposed change to the requirement and plan period seeks to stretch out the **Council's existing housing land supply over a longer period (a further 2 years), as this results in only 11 additional dwellings being required because of the reduced LHN figure of 185 dpa.**

6.4 As we have advocated throughout the Local Plan process and in our Hearing Statements, we are strongly of the view that the Council should be looking to exceed the Government LHN figure, which is a minimum starting point (NPPF paragraph 61). Therefore, we do not agree with the reduced housing requirement of 185 dpa, nor the use of 208 dpa figure in the first two years of the Plan Period.

6.5 The **LHN figure alone does not take account of economic growth and means that the borough's housing requirement are not aligned with its employment requirements and aspirations.** To date we have consistently advocated the use of an OAN based on the 2019 SHMA, which suggests an employment led OAN range of between 236 and 253 dpa and represents a housing requirement which is aligned with economic growth.

6.6 In this regard, we note that Lichfield have prepared an April 2021 update note to respond to the queries raised by the Inspectors following the initial hearing sessions. One of these requests was

to provide modelling of the December 2018 Experian job forecasts to identify the level of housing associated with this level of economic growth. This later data generates a net job growth figure of 1,400 over the slightly longer plan period of 2019-2036. This level of job growth generates a housing need of 242 dpa, as replicated from the Lichfield Note below:

Table 5.1 Summary of Housing Needs Scenario Experian 2018 – with and without PCU (2019-36)

	1,400 jobs	1,400 jobs with PCU
Job growth		1,400
Labour Force growth		1,860
Population change		6,765
Of which natural change		2,298
Of which net migration		4,467
Households	3,970	4,390
Dwellings	4,120	4,556
Dwellings per annum	242 dpa	268 dpa

- 6.7 If a partial catch-up headship rate scenario is applied (which takes into account an adjustment for household suppression amongst younger households in the 15-34 age range, due to affordability issues) the need rises to 268 dpa. So, the latest Lichfield Note indicates an employment led housing growth OAN figure of between 242-268 dpa, which the proposed (and reduced) 185 dpa figure falls significantly short of.
- 6.8 Simply put, we are concerned with the proposal to reduce the housing requirement even further, given that we previously highlighted how the previous 212 dpa figure may meet less than half the jobs growth in the borough, which could result in unsustainable commuting patterns, slower economic growth and a lack of labour force mobility. This concern is further exacerbated with an even lower requirement of 185 dpa.
- 6.9 The proposed housing requirement falls well short of meeting the economic growth needs of the Borough and should be uplifted on this basis. At the very minimum it should revert back to 212 dpa across the whole 17-year plan period (which would equate to 3,604), albeit we suggest this should be higher and utilise the 2019 SHMA employment led OAN figures or the 2021 SHMA updated employment led figure of 242-268 dpa.
- 6.10 As part of our previous representations, we have also raised concerns regarding shortfall in housing land supply (which the Council consider to be insignificant at 22 dwellings/1% of the overall requirement). Notwithstanding these concerns, **the importance of Taylor Wimpey’s two strategic**

sites at H62 (Edenfield) and H64 (Grane Village) is clearly evident. These two sites are critical in **ensuring that the Borough's overall housing requirements are met**. Being the two largest sites in the emerging Local Plan, it is imperative that they come forward and Taylor Wimpey are fully committed to delivering them as quickly as possible (as evidenced in the live planning application for the Grane Village H64 allocation: Ref: 2019/0335).

- 6.11 In overall conclusion, we accept that the Standard Methodology is the starting point for assessing housing need in a local authority and that the latest figure by that methodology is 185 dpa. Whilst this figure has fallen over recent years, that is simply a product of the decreasing trajectory applied by the now rather old 2014 HHP, rather than any increasing level of local affordability generated by an upsurge in delivery and should therefore be adopted with a point of caution. As we have **highlighted, the Council's own evidence base justifies additional homes being planned for to support sustainable levels of growth**.
- 6.12 However, it is also entirely fair to point out, as the Council have themselves in the Housing Paper Update, that the Borough of Rossendale is significantly impaired by steep topography and settlement form that restricts the availability of suitable, developable land for housing. Even if the housing need figures were increased in line with the economic aspirations and strategy, we do recognise that it may not be possible to allocate sufficient suitable land to meet such needs. In light of this, it is imperative that this plan does seek to allocate all sites that are suitable and deliverable, which includes our clients land interests at Grane Village and Edenfield.
- 6.13 Given the aforementioned housing land supply matters, it would also be prudent for the Local Plan to include a mechanism for an early Local Plan Review. This provides the flexibility and comfort to allow the current plan to be found sound and adopted as soon as possible, such that the allocated sites can begin delivering and contributing to the 5-year supply; with the Review addressing development requirements in the later years, where it is acknowledged that the supply is more marginal. A Local Plan Review mechanism will also allow for additional strategic sites/housing land supply to be identified should housing land supply issues arise post adoption of the Plan.

7. MM008 - POLICY HS2: HOUSING SITE ALLOCATIONS

7.1 In respect of MM08 and the revised Table 7 of housing allocations in policy HS2, we endorse the quantum and delivery timescale (year 1 onwards) of **both of Taylor Wimpey's allocations (H62 & H64)** which demonstrates the deliverability of both sites and strong engagement between the Council and Taylor Wimpey as the Local Plan has evolved.

8. MM009 – ALLOCATION H62: LAND WEST OF MARKET STREET, EDENFIELD

8.1 This modification relates to the wording for the individual allocations, we note the proposed amended wording for H62 (which previously had its own separate policy HS3: Edenfield) is as follows:

"Development for approximately 400 houses would be supported provided that:

- 1. The comprehensive development of the entire site is demonstrated through a masterplan with an agreed programme of implementation and phasing;*
- 2. The development is implemented in accordance with an agreed design code;*
- 3. A Transport Assessment is provided demonstrating that the site can be safely and suitably accessed by all users, including disabled people, prior to development taking place on site. In particular:*
 - i. safe vehicular access points to the site are achieved from the field adjacent to no. 5 Blackburn Road and from the field opposite nos. 88 – 116 Market Street. Full details of access, including the number of access points, will be determined through the Transport Assessment work and agreed with the Local Highway Authority;*
 - ii. agree suitable mitigation measures in respect of the capacity of Market Street to accommodate additional traffic. Improvements will be needed to the Market Street corridor from Blackburn Road to the mini-roundabout near the Rawstron Arms. Measures to assist pedestrian and vulnerable road users will be required;*
- 4. A Heritage Statement and Impact Assessment is provided and suitable mitigation measures are identified and secured to conserve, and where possible, enhance the setting of the Church, the non-designated heritage assets which include Chatterton Hey (Heaton House), Mushroom House, and the former Vicarage, and the other designated and non-designated heritage assets in the area;*
- 5. Specific criteria for the design and layout needs to take account of:*
 - i. Retention and strengthening of the woodland enclosures to the north and south of the Church*
 - ii. The layout of the housing parcels should be designed to allow views to the Church to continue*
 - iii. The relationship of the new dwellings to the Recreation Ground to ensure safe nonvehicular access is provided*
 - iv. Public open space to be provided along the woodland area south of the brook / Church enclosure*
 - v. Landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development and provide a buffer to the new Green Belt boundary*

-
- vi. Materials and boundary treatments should reflect the local context*
- 6. An Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts particularly on the Woodland Network and stepping stone habitat located within the site.*
- 7. Compensatory improvements must be provided to the Green Belt land in proximity of the site in accordance with Policy SD4*
- 8. Geotechnical investigations will be required to confirm land stability and protection of the A56, and consideration paid to the suitability or not of sustainable drainage systems on the boundary adjoining the A56*
- 9. Provision will be required to expand either Edenfield CE Primary School or Stubbins Primary School from a 1 form entry to a 1.5 form entry primary school, and for a secondary school contribution subject to the Education Authority. Land to the rear of Edenfield CE Primary School which may be suitable is shown on the Policies Map as 'Potential School and Playing Field Extension'. Any proposals to extend the schools into the Green Belt would need to be justified under very special circumstances and the provisions of paragraph 144 of the NPPF;*
- 10. Noise and air quality impacts will need to be investigated and necessary mitigation measures secured;*
- 11. Consideration should be given to any potential future road widening on the amenity of any dwellings facing the A56."*

- 8.2 We comment on the individual elements of policy H62 below.
- 8.3 Criterion (Masterplan and Phasing): The three active landowners within the Edenfield allocation have prepared a Masterplan and Design Code Scoping Brief, which was submitted to the Council in January 2021, following early Concept Masterplans submitted at Reg 18 and Reg 19 stages. The Landowners are keen to drive the process so that the Masterplan can be adopted as soon as possible such that the delivery timeline for the allocation can be maintained. Unfortunately, limited progress has been made with the Council to date, albeit the Landowners are keen to maintain proactive engagement. As the key strategic site in Edenfield, it is crucial that the Masterplan is progressed and approved by the Council as soon as possible.
- 8.4 Criterion 2 (Design Code): As above. The Landowners have sought to drive the Design Code progress alongside the masterplan to avoid any delays once the plan is adopted.
- 8.5 Criterion 3 (Highways): In terms of paragraph i), **Taylor Wimpey's access point is located on the field opposite nos. 88 – 116 Market Street.** As demonstrated throughout the Examination process, an acceptable site access can be delivered to accommodate the development proposals and LCC Highways have raised no issues with a proposed access point in this location.

8.6 With regards to paragraph ii), it is noted that improvements will be needed to the Market Street corridor from Blackburn Road to the mini-roundabout near the 'Rostron Arms' (**it is spelt incorrectly** in the document). We would like to reiterate that a detailed highways note considering the cumulative impacts that 400 dwellings will have on the highway network has already been prepared and submitted with our Regulation 19 Representations. Notably, this technical assessment has already assessed the mini roundabout near the Rostron Arms which LCC mention in their response replicated above. The Croft highways note, ultimately concludes that:

"The study has considered the impact of the proposals on the key junction within Edenfield, namely the Market Street/Rochdale Road/Bury Road mini-roundabout, at both 2024 and 2034 assessment years.

*Based on the above, it can be concluded that the Market Street/Rochdale Road/Bury Road mini-roundabout can accommodate the likely levels of traffic associated with the draft allocation sites without any significant impacts on the surrounding highway **network**."*

8.7 The technical work to date has therefore confirmed that the H62 allocation can be delivered without any significant impacts on the surrounding highway network. Taylor Wimpey will continue to proactively work with LCC to address highways matters at the planning application stage, however for now robust technical information has been provided to demonstrate that the H62 allocation is entirely suitable for housing allocation from a highways perspective.

8.8 Criterion 4 (Heritage): We welcome clarification since previous evidence base documents that the heritage constraints in this location, notably the Grade II Listed Church will not compromise the developable area or reduce the capacity of the site (400 dwellings), subject to suitable mitigation, and TW can confirm that they will provide a detailed Heritage Statement and Impact Assessment with any future planning application, as they would for any site of this nature.

8.9 However we would stress that in no point of the process, within any of the multiple consultations or evidence base document or has Mushroom House been identified as a non-designated heritage **asset in need of protection**. **Indeed, it is not mentioned in the Council's HIA that supported** the submitted plan or subsequent evidence, nor in our own Heritage Note² and evidence given at the EIP Hearings which was not disputed/ rebutted on the day.

8.10 Accordingly we would request that this reference is removed from the policy unless the Council can provide evidence for its inclusion and a list of the criteria that such assets are considered against.

8.11 Criterion 5 (Design and Layout): We welcome that the design and layout criteria have been simplified and reduced to avoid duplication of details covered in other detailed policies. In terms of heritage matters, we note that the heritage assessment undertaken on behalf of the Council (Action 14.3) concluded the following:

² Appendix 7 of our Matter 14 Hearing Statement.

"I feel this level of harm could be mitigated by;

- *Carefully planning the layout of the housing parcels to allow those glimpsed views to continue i.e. by aligning the principle road(s) along a north-south or north east – south west axis.*
- *The strategic positioning of POS along the sensitive woodland area south of the brook/Church enclosure.*
- ***Augmenting the existing tree planting in the woodland areas."***

8.12 Paragraphs i) and iv), as proposed in the Main Modifications, reflect the findings of the heritage assessment. We do however recommend some minor amendments to paragraph ii), as follows:

ii. The layout of the housing parcels should be designed to allow key glimpsed views to the Church to continue

8.13 We do not have any particular comments on the other individual requirements, which are fairly standard and will be dealt with at the planning application stage.

8.14 Criterion 6 (Ecological Assessment): No comment.

8.15 Criterion 7 (Compensatory Improvements): As noted in our response to MM005, we have concerns regarding the compensatory improvements currently proposed in policy SD4; mainly that the viability and land ownership implications of these measures have not been properly assessed. Further evidence must be provided by the Council to justify this policy and if it is not then the policy should be deleted, as well as criteria 7 of H62.

8.16 Criterion 8 (Geotechnical Investigations): No detailed comments, other than to reiterate the previous conclusions of the Betts Geo Site Investigation Report commissioned by Taylor Wimpey that:

"No significant Geotechnical Risks have been identified to the A56 from the proposed development which should prevent the site from being formally 'allocated' within the Rossendale Development Plan.

Desk based studies indicate that the site generally poses a low risk to the proposed development from both environmental and geotechnical issues. This risk classification will be assessed further at planning stage (subject to allocation) through appropriately designed intrusive ground investigations".

8.17 Criterion 9 (Primary School): We welcome and fully support the change of policy wording, which recognises that there is no evidenced need to provide a new primary school within the Edenfield allocation. Instead, the focus is on expansion at either Edenfield CE Primary School or Stubbins Primary School, which we fully endorse. This mechanism would be funded by developer

contributions (**in line with LCC's standard formula**) as opposed to the provision of a new school on site.

- 8.18 Criterion 10 (Noise and air quality impacts): No comment.
- 8.19 Criterion 11 (Road Widening): It is stated that consideration should be given to any potential future road widening on the amenity of any dwellings facing the A56. Firstly, there is no committed or even potential scheme or costings in any of the supporting Highways evidence, just a vague statement that widening may be required at some point post 2030, so it is questionable whether any mention of this in the policy is justified.
- 8.20 Notwithstanding this, the proposed masterplan for H62 shows significant stand-offs (45m +) from the slopes along the A56, and there are no other changes (topography, crossings, etc) proposed at this boundary, so the slope conditions and loading regime will not change. It is therefore considered that this has already been appropriately assessed and accounted for.
- 8.21 To conclude, we remain wholly supportive of the inclusion of H62 as a strategic allocation in the Plan. We are generally happy with the wording of policy H62, albeit do have some concerns with wording relating to the non-designated heritage asset of Mushroom House.

General Comments on Site Specific Policies

- 8.22 Finally, as a general comment on this section, whilst we have accepted the requirement for a dedicated policy for the Edenfield allocation (H62), given its scale in the context of Rossendale, current Green Belt status and other associated sensitivities; it is not clear whether the other 31 allocations justify a similar level of detail.
- 8.23 Whilst we come on to the policy for H64 in the next section, and do not necessarily dispute any individual criteria or element of the other site policies, given we are not close to these sites, we are concerned that these will lead to delays in overall housing delivery.
- 8.24 This is on the basis that several of them require Masterplans and Design Codes to be prepared in advance of planning applications, however we know that the Council have an extremely small policy team, so would question whether they have the resource to engage review and ultimately adopt these documents in a timely fashion so as not to hold up ensuing applications and the wider trajectory (which relies on a large number of these sites making a contribution in the early years of the plan period).
- 8.25 In our view, there could be merit in removing or simplifying some of these policies on smaller sites such that Policy Officers can focus on the Masterplan and Design Code requirements for the Edenfield Allocation (H62) and other larger sites, as these make the biggest contribution to the overall supply and should not be delayed any further.

9. MM009 – ALLOCATION H64: GRANE ROAD, HELMSHORE

9.1 The policy states that:

"Development of up to 139 dwellings will be supported provided that:

- 1. Vehicular access should be created with a junction on Holcombe Road;*
- 2. A Flood Risk Assessment and drainage management strategy is submitted which guides the layout of the development and secures the appropriate mitigation measures necessary;*
- 3. An Ecological Assessment is undertaken which identifies suitable mitigation measures for any adverse impacts on the adjacent Grassland, and Woodland stepping stone habitats;*
- 4. Landscaping of an appropriate density and height is implemented throughout the site to 'soften' the overall impact of the development;*
- 5. The site has recorded areas of contaminated land connected to historic land uses and therefore investigations and relevant remediation measures will be required."*

9.2 We are wholly supportive of this policy and have no particular comments, other than to note that the live Taylor Wimpey planning application (Ref: 2019/0335) for 131 no. dwellings on this allocation is close to determination, demonstrating its deliverability.

10. MM013 – POLICY HS3: AFFORDABLE HOUSING

10.1 Part of the policy notes the following:

"In particular the SHMA indicates there is a requirement for:

- *Older peoples housing, especially extra care and residential care, of around 1700 units by 2034*
- *Housing suitable for Disabled people*
- *Social rented housing in rural communities*

The Council will expect, where appropriate, a proportion of the affordable housing provided to meet these needs. This is to be considered in conjunction with policy HS8."

10.2 Whilst Taylor Wimpey, as a responsible housebuilder are fully aware of the need to meet the specialist housing needs discussed above, we recommend that the wording of the policy be amended slightly as follows:

The Council will ~~expect~~ seek, where appropriate and viable, a proportion of the affordable housing provided to meet these needs. This is to be considered in conjunction with policy HS8."

10.3 This allows for further flexibility, in circumstances where it is feasible or appropriate to provide such housing on specific development sites.

10.4 This need for flexibility aligns with the Inspectors observation during the Viability Hearing Session that the Viability evidence suggests that the majority of the housing sites proposed in the plan will not be able to deliver 30% Affordable Housing.

11. MM015 – POLICY HS5: HOUSING STANDARDS

- 11.1 We support the removal of references to the National Space Standards, as these were not justified by the evidence.
- 11.2 In terms of the retention of the requirement for at least 20% of any new housing to be line with the Optional Standards M4(2) of the Building Regulations, we remain unconvinced that the requirement has been fully justified.
- 11.3 Firstly, the flexibility in wording has been removed from the policy, therefore the Main Modifications wording does not allow for instances where it may not be possible to deliver this requirement due to viability and site-specific considerations.
- 11.4 The explanatory text to this policy indicates that the SHMA highlights a considerable growth in the number of elderly households, as well as a high percentage of households containing one or more adults with some form of disability.
- 11.5 This reflects the aging population trend which can be seen nation-wide. Paragraph 10.74 of the SHMA also confirms that 18.5% of households in Rossendale contain one or more adults with some form of disability. However, whilst the SHMA provides a starting point in establishing demographic trends, it does not provide enough evidence to translate this into a policy threshold for housing to be adapted to these specific groups and certainly not one set at 20%.
- 11.6 Firstly, neither the SHMA nor wider evidence base confirms the proportion of these groups who will require dedicated, and wheelchair adaptable new housing, as many may wish to stay put and adapt their own homes. Furthermore, whilst the Viability Assessment states that it has factored these requirements in, these are insufficiently evidenced and justified in the report, which gives no detailed breakdown of the costs involved.
- 11.7 It is worth reiterating Section 56 of the NPPG, which confirms that the introduction of new enhanced standards on water efficiency, accessibility and spaces are optional, and must be justified by specific evidence on need and viability before they can be implemented. The evidence in this instance falls well short of demonstrating the need or viability of a 20% target.

-
12. MM040 – STRATEGIC POLICY ENV1: HIGH QUALITY DEVELOPMENT IN THE BOROUGH
- 12.1 We are in general support of this policy and criteria, notwithstanding the more detailed comments we provide on the criteria of the policies covering H62 and H64.
- 12.2 However we note that the explanation includes additional text stating '*a Design Guide SPD will be prepared to provide specific advice to developers*'. Whilst we welcome the Council's desire to provide more certainty and guidance to developers on the form the Masterplans/ Development Briefs and Design Codes required by the site specific policies; we are conscious that this is likely to take some time to progress and adopt as such policy documents always do, and that this should not slow down or prevent allocations (and associated Design documents) coming forward in the interim, particularly those such as Edenfield (H62) and Grane Village (H64) which the Council are reliant on delivering within years 1-5 of their trajectory to boost their five year housing land supply.

13. MM041 – STRATEGIC POLICY ENV2: HISTORIC ENVIRONMENT

- 13.1 The explanation confirms that '*A new Local List will be introduced to provide protection to key non-designated assets that make a strong contribution to the areas character*'. Further to our comments at para 8.10 we would ask that this new list is published as soon as possible to provide developers and applicants with certainty of those newly identified non-designated assets that need to be accounted for (including Mushroom House as mentioned in the site specific policy for H62).
- 13.2 We would reiterate that this list should include a clear methodology and list of criteria for those assets that are to be included.

14. MM048 - POLICY ENV9: SURFACE WATER RUN-OFF, FLOOD RISK ETC

14.1 We are generally supportive of this policy which largely reflects current national guidance on drainage and Flood Risk.

14.2 However, as with the Design Guide SPD, the publication of a Climate Change SPD mentioned in the explanation section is likely to take some time and should not prevent or slow down allocations or any other development sites coming forward in the interim.

15. MM053 - POLICY TR4: PARKING

- 15.1 In respect of Electric Vehicle Charging Points we would reiterate the position of the HBF that the policy should include more flexibility to specify that it will only apply on a per house basis where off-street parking is being proposed for the dwelling.
- 15.2 Furthermore, **given Government's consultation on including EV Charging points as part of Building Regulations**, it is possible that this policy will be superseded with a nationally defined standard.

16. MM054: MONITORING & TABLE 11 MONITORING FRAMEWORK

- 16.1 We welcome the inclusion of and commitment to monitoring measures in respect of housing delivery (shortfall in 5 year supply of greater than 1 year, and alignment to the requirements of the Housing Delivery Test) and the acknowledgement that these could trigger the need for a review of the Local Plan.
- 16.2 One suggested addition as a trigger/ action for Table 11, relates to delivery of the housing allocations subject to site specific policies (including Sites H62 and H64), and whether these policies can be relaxed/ flexibility applied, where they are shown to be delaying delivery on site compared to the adopted trajectory.

17. CONCLUSIONS

- 17.1 To conclude, Taylor Wimpey continue to be supportive of the Rossendale Local Plan as a whole. Whilst we have some outstanding and ongoing concerns regarding some of the detailed policy wording; we are supportive of the overall strategy and consider it a sound plan overall, particularly with the proposed mechanisms for an early review.
- 17.2 It is clear that the Council have addressed a number of concerns that were raised at the Local Plan Examination in order to move the plan forward towards adoption. That said, there are still important gaps in the evidence base and policy wording, for which we would welcome further clarification.
- 17.3 **It is important to reiterate that Taylor Wimpey's** land interests at Edenfield (within Housing Allocation H62) and Grane Village, Helmshore (within Housing Allocation H64) are the two largest sites in the Local Plan. As such, it is imperative that these strategic sites deliver as quickly as possible in order to help achieve the overall development targets of the Local Plan.
- 17.4 As such, it is important that the Local Plan is adopted as soon as possible (i.e. in December 2021 as targeted) to help facilitate growth, and Taylor Wimpey are keen to continue working positively and proactively with the Council to achieve this aim.